



Digital Submission Only – Implementation Guide

Purpose

This document defines the **minimum required capabilities** for a firm to be considered **live on Digital Submission Only (DSO)**. It describes *what must be implemented* without prescribing *how* those capabilities are technically delivered, allowing flexibility across carriers, distributors, and order entry platforms (AOEs).

What Digital Submission Only Is

Digital Submission Only is an operating model where **annuity contracts must be issued electronically, trusting the electronic data such that carriers will issue contracts using the digital data alone**, without reliance on validating electronic applications or post-submission documents.

All regulatory, disclosure, suitability, and audit requirements **remain unchanged**. Only the requirement for electronic submission, electronic payment, and validation of errors upfront, changes.

Definition of Done: Required Capabilities

A firm is considered **DSO-Live** when **all** the following are true.

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI's prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an "as is" basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.



1. Issue Contract Off Data Only (No Paper Dependency)

- Carriers issue contracts using **digital application data as the system of record** and signed paperwork is not reviewed for completeness or data.
- Signed paperwork is stored for retention purposes only.
- Paper is not used as a proxy for completeness or progress.

2. Electronic Submission & E-Signature

- Applications and all the data needed to issue a contract are submitted electronically.
- Required signatures are captured via e-signature on 90% of cases.
 - Order Entry should leverage Cooperative Technologies to properly pull in signature rules and processing location information required to ensure In-good order.
- Required paperwork is sent to the owing party. Distribution will receive distribution forms; carriers will receive carrier required forms. Each will store the required forms for recordkeeping regulatory purposes only (see attached spreadsheet). The data on the forms will not be looked at or matched to the submitted data. Only the submitted data will be used to issue the policy.
- Manual review of paperwork will only happen when a DSO checkpoint fails or audits require it. Paper applications and wet signatures are not required to be reviewed for clean cases.

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI's prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an "as is" basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.



- Audit trail is collected and stored along with documents showing delivery.
-

3. No Post-Submission Attachments

- All required data, disclosures, and signatures are captured **at initial submission. To be clear, no supplemental attachments will be submitted post-submission.**
-
-

Data Requirements

All data must be collected and validated upfront to eliminate errors, ensure the data is collected and sent to the carrier for contract issuance. This will ensure all orders are eligible for e-signature. Below are required data collection to be considered DSO live.

4. Authorized Person Capture (Entity-Owned Contracts)

- The authorized signer (e.g., trustee, POA, corporate officer) is captured as a **structured data element and eligible for e-signatures.**
- Carrier rules clearly map and included in the data submission:
 - Who is authorized to sign

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI's prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an "as is" basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.



- What signatures are required
- How those signatures support issuance
- Entity-owned contracts can be issued digitally without falling out to paper.

5. Replacement Question Alignment (Pre-Submission)

- Replacement questions completed by the **client and financial professional** are validated as **matching prior to submission**.
- Mismatched responses prevent submission and are not passed to the carrier.
- Replacement mismatches are treated as a **pre-submission failure**, not a carrier-side NIGO.

6. State-Specific Requirements Embedded Digitally

- State-specific rules are enforced within the digital workflow. A few common examples that must be solved include:
 - Florida producer address requirements
 - State variations of replacement requirements
- Where FP responses and customer responses need to match, submission is blocked when there is a discrepancy and solved inside of order entry prior to submission.

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI's prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an "as is" basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.



- Manual remediation for common state rules is not required.
-
-

Funding

Funding must be completed electronically in 1 of the below 3 methods:

7. DFA Paperless Replacements (RPL) Standard Enabled

- 90% Replacement transactions are supported digitally via an order entry and e-signature.
 - Replacement notice and data requirements are satisfied through digital exchange.
-

8. DTCC Money Settlement (STL)

- Digital premium funding method through the DTCC is used when STL is eligible.
 - Money movement does not introduce manual gating steps.
-

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI's prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an "as is" basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.



9. Digital Funding

- Digital premium funding methods (ACH, wire, or equivalent) are enabled.
- Money movement does not introduce a paper or manual gating step.

Funding Information Validated Pre-Submission

- All orders, regardless of funding method, must have funding availability validated. Prior to submission. For example, BDs may perform a funding availability call to ensure the money is available for money movement.
 - For orders that cannot be settled via DTCC Money Settlement, banking data is validated **before submission**. Examples of banking account validation tools include GIACT.
 - Banking and funding validation does not delay issuance after receipt.
-
-

Structured Data Transmission

- Application data is transmitted via **structured integration** (API or DTCC App/Sub file).

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI's prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an "as is" basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.



- Order should be processed straight through with no requirement for manual data entry of application data. In other words, when the order gets to the carrier, it should be able to be put into an automated process that does not require a manual data entry role.
-

Validation Requirements of Data prior to submission

10. CanSell Integration

- Licensing and appointment and training eligibility is verified digitally prior to submissions.
 - CanSell results are incorporated into submission and processing workflows such that errors that are a hard stop, are stopped prior to submission. Soft stop and warnings are allowed to be sent.
-

11. Producer Training Update API Enabled

- Producer training update is implemented at the firm responding to the CanSell such that the CanSell will correctly report the training status. By coupling the Training Update with CanSell, the status is validated digitally with the most current training data.
- Training does not require manual follow-up or documentation.

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI's prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an "as is" basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.



Suitability

- Individual suitability requirements are not changing but IRI best practice is to validate suitability ahead of submission with rules and scoring to ensure errors are caught before submitting the application.
-
-

Not-in-Good-Order (NIGO) Management (Required, but Flexible)

To be considered DSO, firms need to mitigate situations that force orders to paper workflows, manual processes, or out of e-signatures. That means known NIGO scenarios that undermine reliance on the digital model must be:

- Actively identified
- Prioritized for remediation
- Addressed collaboratively across carriers, distributors, and AOE's

Note:

A formal, automated NIGO feedback loop is **recommended but not required** to be considered DSO-Live.

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI's prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an "as is" basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.



Reporting on Digital Submission Only Metrics (Required)

In order to validate DSO status, monthly reporting is due on the below metrics each month.

- % of cases issued with no manual intervention,
- AND
- % of cases issued from submission to issuance in 48 hours

% of cases issued from receipt of contract money (STL/RPL or other Digital Funding) within 24 hours

What Does Not Change

- Suitability requirements
- Replacement regulations
- Disclosure obligations
- Consumer protections
- Audit and record-retention expectations
- Signature requirements of the consumer and financial professional
- Retention requirements of the signed paperwork

DSO changes **how data is delivered and validated**, not **what is required**.

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI's prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an "as is" basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.



When a Firm Can Say “We Are Live on DSO”

A firm may credibly claim to be **DSO-Live** when:

- Clean cases issue without paper
- Entity-owned contracts do not default to manual handling
- Replacement, banking, and state-specific validations occur **before submission**
- No post-submission attachments are required
- Digital integrations (RPL, STL, CanSell, Producer Training API) are active

©2026 Insured Retirement Institute (IRI). All rights reserved. No portion of this publication may be used, reproduced, or distributed by any person or entity other than IRI member firms without IRI’s prior written consent. IRI member firms are expressly permitted to use, reproduce, or distribute any portion of this publication for internal and external business purposes, provided that such use is accompanied by appropriate attribution. Licensing fees may apply to any other person or entity seeking to use, reproduce, or distribute any portion of this publication. This publication is provided on an “as is” basis for informational and educational purposes only. IRI makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of any information, content, or materials included in this publication. In no event shall IRI be liable for any damages whatsoever arising out of, or in connection with, the use of the information, content, or materials included herein.