



Purpose

This maturity model describes the **progressive stages of adoption** for Digital Submission Only. It provides a shared framework for carriers, distributors, and order entry platforms to assess readiness, align expectations, and understand what is required to move from paper-dependent workflows to fully scaled digital issuance.

Level 0 — Fully Paper / Paper-Dependent

Description

Paper is required to issue annuity contracts. Digital tools may exist, but they do not eliminate paper dependencies.

Characteristics

- Paper applications or wet signatures required
- Scanned documents used as the system of record
- Manual data re-keying common
- Replacement processing relies on paper forms
- Banking, state rules, and signature issues resolved after submission

Outcome

- High NIGO rates: >50%
 - Long cycle times: avg TAT is >5 days
 - No reliance on digital data for issuance
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Level 1 — Hybrid / Digitally Assisted

Description

Digital submission is available, but paper remains a frequent fallback and clean cases are not consistently issued off data.

Characteristics



- Electronic submission and e-signature supported
- Paper or attachments often required post-submission
- Replacement questions captured digitally but not validated for alignment
- Banking information validated after carrier receipt
- State-specific rules handled manually or inconsistently

Outcome

- Partial efficiency gains: NIGO rate <40%
- Digital trust remains low
- Paper still disrupts issuance: paper apps exceeding 50% of all cases

Level 2 — DSO-Capable

Description

Core digital capabilities are in place, and some clean cases can issue off data, but the model is not yet reliable or repeatable.

Characteristics

- Clean cases *can* issue digitally in limited scenarios
- Electronic submission and e-signature are standard
- Paperless Replacements supported in some cases
- Partial pre-submission data validation
- State rules embedded for select jurisdictions
- Entity-owned contracts often fall out to manual handling

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Outcome

- DSO works in pockets
 - Firms cannot yet credibly claim to be “live”
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Level 3 — DSO-Live (Definition of Done Met)

Description

The firm can confidently issue annuity contracts using **validated digital data alone** for clean cases, without paper dependencies.

Required Characteristics

- Contracts issue off digital data without paper applications
- No post-submission attachments for clean cases
- Authorized person captured and validated for entity-owned contracts
- Replacement answers from client and producer validated as matching **prior to submission**
- Banking information validated pre-submission
- State-specific requirements embedded digitally (e.g., FL producer address, replacement variations)
- Paperless Replacements enabled
- Digital money settlement enabled
- Structured data transmission (API or equivalent)
- CanSell and Producer Training integrations active where required

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Outcome

- Predictable issuance: >50% of cases issued in 48 hours
 - Reduced NIGO: NIGO rate <20%
 - Credible claim of Digital Submission Only
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Level 4 — DSO-Scaled

Description

Digital Submission Only is the default operating model across products, partners, and jurisdictions.

Characteristics

- DSO applied across multiple carriers, distributors, and platforms
- Broad product coverage
- Clean cases routinely achieve accelerated issue times (e.g., ~24 hours where suitability is delegated)
- Known NIGO scenarios continuously identified and remediated
- Paper is the exception, not the process

Outcome

- DSO is institutionalized: 80% cases issued off data only
 - Operational efficiency is sustained at scale
 - Digital trust is established across the ecosystem
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How This Model Is Intended to Be Used

- **Members** self-assess readiness without ambiguity
- **IRI / DFA** anchor “DSO-Live” claims to observable capabilities
- **Pilots** intentionally move participants from *DSO-Capable* → *DSO-Live* → *DSO-Scaled*

Heat Map

A visualization of capabilities to show where a firm stands and what capabilities need to be enhanced to move up in certification.

[DSO Maturity Heat Map – Insured Retirement Institute \(IRI\)](#)

Interpretation Guidance

Minimum Threshold for DSO-Live

To claim **DSO-Live**, a firm must demonstrate ■ **across all Level 3 capabilities**, especially:

- Issue off data
- Authorized person capture
- Replacement alignment validation
- Pre-submission banking validation
- Embedded state rules
- No post-submission attachments

These are the controls that preserve **reliance on the digital model**, as intended by the Best Practice.

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Common Misclassification Risk

Firms often believe they are DSO-Live while still showing ■ in:

- Entity-owned contract handling
- Replacement alignment validation
- Banking validation timing

These gaps reintroduce manual intervention and paper, breaking straight-through processing.

Level 4 Focuses on Scale, Not Eligibility

Level 4 capabilities improve **consistency, speed, and industry-wide adoption**, but are **not required** to declare DSO-Live.

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