# Annuity Recommendation File Worksheet: eight blocks mapped to NAIC Model #275

One page per sale. Client (initials): _____ Producer: _____ Date of recommendation or sale: _____ Variant: [ ] A insurance-only [ ] B also registered rep, investment adviser rep or plan fiduciary

*This worksheet maps each of the model's four obligations to a place in the file. It is not a compliance form and promises no outcome in a review. The state's rule and the carrier's forms decide what a given file must hold. "Practice" marks a suggested way to meet a model duty that the model does not prescribe as a record. Draft of 2026-11-05, not yet signed off by a named reviewer.*

| Block | What to record | Model or practice | Section | Usually lives in (practice) | Your entry |
|---|---|---|---|---|---|
| **1. Client profile** | Each of the 14 profile items below, the source of each answer and the date. Where the client refuses or gives limited information, attach the signed Appendix B statement, or a form substantially similar to it. Marking which items were refused is practice. | Model text for the 14 items and the Appendix B statement; the source, the date and the marking are practice | 5C, 6A(1), 6A(4) | Fact-finder; carrier application; CRM | |
| **2. Products considered** | Types within your license and authority that address the stated need, and why each other option was set aside. | Practice | 6A(1) | CRM note; case notes | |
| **3. Basis** | Need, with source and date; the feature that answers it; the cost and trade-off disclosed, including the surrender schedule; the alternative within your license set aside, with the reason. The factors read together, not in isolation. | Model text for the written basis; the four-part pattern is practice | 6A(1), 6A(4) | Carrier application basis field; CRM note | |
| **4. Disclosure delivered** | Form used, date, how delivered, and any update before the sale. Suggested addition: note that the client was told guarantees are contractual and depend on the insurer's claims-paying ability. | Model text for the form and its date; how it was delivered, any update and the claims-paying note are practice | 6A(2) | Signed Appendix A or state form; carrier forms | |
| **5. Conflicts** | Conflicts checked, and what was done: disclosed, managed, avoided or did not make the recommendation. | Practice | 6A(3) | CRM note; agency conflict log | |
| **6. Replacement items** | One row per contract replaced: surrender charge now and at the next anniversary, new surrender period, benefits lost, higher fees and rider charges, the income compared at the client's start age, and any other exchange or replacement in the last 60 months. | Model text | 6A(1)(j) | Carrier replacement forms; comparison sheet | |
| **7. Client decision not based on your recommendation** | Appendix C statement and date. Noting why this is not a recommendation is practice. Use it only when you made no recommendation. | Model text for the statement; the note is practice | 6A(4), 6B | Signed Appendix C | |
| **8. Where the file is kept and for how long** | Retention period from the state's text; whether the carrier holds a copy. | Model text | 9 | Agency records policy | |

**The 14 profile items (Section 5C, a minimum; a state can add items).** Tick each item collected.

[ ] 1. Age (source / date: _____)

[ ] 2. Annual income (source / date: _____)

[ ] 3. Financial situation and needs, including debts and other obligations (source / date: _____)

[ ] 4. Financial experience (source / date: _____)

[ ] 5. Insurance needs (source / date: _____)

[ ] 6. Financial objectives (source / date: _____)

[ ] 7. Intended use of the annuity (source / date: _____)

[ ] 8. Financial time horizon (source / date: _____)

[ ] 9. Existing assets or financial products, including holdings in investments, in annuities and in insurance (source / date: _____)

[ ] 10. Liquidity needs (source / date: _____)

[ ] 11. Liquid net worth (source / date: _____)

[ ] 12. Risk tolerance, including willingness to accept non-guaranteed elements (source / date: _____)

[ ] 13. Financial resources used to fund the annuity (source / date: _____)

[ ] 14. Tax status (source / date: _____)

## Page 2: Variant B additions, and a hypothetical filled-in example

| Addition | What to record | Section | Your entry |
|---|---|---|---|
| B1. Comparable standard relied on | Which standard applies to this sale: SEC and FINRA rules, Advisers Act duties, or ERISA or Code duties. | 6E | |
| B2. Supervising entity | The entity, and the date you confirmed you are acting under its comparable-standard controls for this sale. | 6E | |
| B3. Product type | Registered security, or fixed or fixed indexed annuity; whether the entity applies its controls to this product. | 6E; NAIC guidance | |
| B4. Registration in your state's definition | Federal only, or federal or state, as the state's text reads. | 6E | |
| B5. Prohibited practices and insurer role | Section 6D respected; what the insurer reports to the supervising entity, if you know. | 6D, 6E | |

**Hypothetical filled-in example (not a real client).** First six blocks of a replacement file. Invented numbers: a $200,000 contract with a 4 percent surrender charge (4% x $200,000 = $8,000, so $192,000 moves); invented payout rates of 5.0 and 5.5 percent.

| Block | Entry in the example |
|---|---|
| 1. Client profile | All 14 items recorded with source and date; liquid net worth taken from the client's account statement; no item refused. |
| 2. Products considered | Fixed indexed annuity with a lifetime withdrawal rider; multi-year guaranteed annuity. Both inside the producer's license. Guaranteed annuity set aside because the client wants income to start at 67. |
| 3. Basis | Need: income for as long as the client lives from 67 (interview and account statement, 2026-10-19). Feature: the rider, whose payments are contractual and depend on the issuing insurer's claims-paying ability. Cost and trade-off: rider fee and a new seven-year surrender period, shown in writing on 2026-10-26. Benefit over the old contract: comparison written with figures from both contracts (block 6); if no substantial benefit can be stated, the entry records that the replacement was not recommended. Alternative set aside: the guaranteed annuity, for the reason in block 2. |
| 4. Disclosure delivered | State form given at the first meeting on 2026-10-19; no update needed before the recommendation of 2026-11-05. Client told that guarantees depend on the insurer's claims-paying ability. |
| 5. Conflicts | Checked on 2026-10-19; none found beyond compensation, which is on the form. |
| 6. Replacement items | One contract: $8,000 surrender charge now; new seven-year surrender period; rider base $240,000 old against $192,000 new; income at 67: $12,000 a year on the old contract against $10,560 on the new, which is $1,440 a year less; one other exchange on 2022-02-10, inside the 60 months before 2026-11-05. |

*The example shows structure only. It does not say a replacement is or is not in a client's interest. Educational information, not legal or tax advice. Companion to "NAIC Model #275 by State" (annuitiesgenius.com/blog/naic-model-275-best-interest-by-state). Model section numbers are those of the Spring 2020 edition.*