

Directly Held Business NIGOs

REFERENCE GUIDE

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Overview

This reference sheet provides variable annuity and directly held Not in Good Order (NIGO) best practices and includes information related to the following:

- NIGO communications
- Potential NIGO reasons
- Explanation of NIGO reasons
- Resolution methods

Note: For more detailed information about locating, filling out, and uploading the forms mentioned throughout this reference guide, refer to the [Forms Library Overview Reference Sheet](#).

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Directly Held Business NIGOs

Requirements to Resolve NIGO Submissions

NIGO Communication for Directly Held Business, Including Variable Annuities

All directly held NIGOs, including Variable Annuities, will be communicated via the Case Manager notifying the Registered Representative (representative) of record, listed on the new account documentation.

Case history and details, including NIGO notes, will be available through the Case Manager.

NOTE! For variable annuity applications submitted through the Variable Annuity Order Entry (VAOE) system, see the Variable Annuity Transaction Summary (VATS) section within this reference guide.

MML Investors Services NIGO Correction Policy

Any changes or alterations to an application should be made by crossing out the incorrect information and neatly inserting the correct information. All such changes must be initiated and dated by the applicant; whiteout may never be used.

NOTE! This policy excludes Variable Annuity transaction summary updates.

NIGO Reasons and Resolutions

The following table lists possible reasons for a submission to be NIGO, an explanation of why the correction is needed, and the method(s) to resolve stated issues. The three types of resolutions include calling the MMLIS home office, resolving the NIGO within Case Manager, or uploading the documents within Advisor360°.

The NIGOs have been grouped into Missing MMLIS Forms, Missing Ancillary Documents, and Missing Form Elements.

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Missing MMLIS Forms

NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
Missing Master Services Agreement (MSA)	For MSA-eligible accounts, MMLIS requires a fully executed MSA.	Not applicable	Not applicable	Missing client name, Missing SSN, Missing TIN, Missing client or rep signature/signature date
Missing or Incomplete Investor Account Form (IAF)	MMLIS requires a fully completed Investor Account Form to process every new registration type of business. If the registration type already exists, a Transaction Detail Form (TDF) can be submitted for all subsequent investments with new fund companies.	Registration type, Investment purpose, Investment objective, Risk tolerance, Investment time horizon, Address, Phone number, Date of birth, Citizenship, Occupation/employer info, FINRA member/senior foreign political figure, U.S. government-issued photo ID information, Financial profile, Investment product knowledge, Assets held away	Registration type, Investment purpose, Investment objective, Risk tolerance, Investment time horizon, Address, Phone number, Date of birth, Citizenship, Occupation/employer info, FINRA member/senior foreign political figure, U.S. government-issued photo ID information, Financial profile, Investment product knowledge, Assets held away, Missing registered representative signature/signature date	Missing client name, Missing SSN, Missing TIN, Incomplete trusted contact information, Missing client signature/signature date

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NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
Missing or Incomplete Transaction Detail Form (TDF)	MMLIS requires a Transaction Detail Form for direct business.	Not applicable	Missing form, Missing registered representative signature/signature date	Incomplete form, Missing client signature/signature date
Missing or Incomplete CRIA Asset Transition Form	MMLIS requires a fully completed CRIA Asset Transition Form .	Not applicable	Missing form, Missing registered representative signature/signature date	Incomplete form, Missing client signature/signature date Client signature date
Missing or Incomplete NY Variable Life Supplement	MMLIS requires the NY Variable Life Supplement for New York directly held variable life sales transactions.	Not applicable	Missing form, Missing registered representative signature/signature date	Incomplete form, Missing client signature, Client signature date
Missing or Incomplete NY Variable Annuity Supplement	MMLIS requires the NY Variable Annuity Supplement for New York directly held variable annuity sales transactions.	Not applicable	Missing form, Missing registered representative signature/signature date	Incomplete form, Missing client signature/signature date
Missing or Incomplete Share Class Disclosure Form	The Share Class Disclosure Form must be submitted when a client is making investments into either B or C shares.	Not applicable	Missing form, Missing registered representative signature/signature date Client name, Fund company, Name of fund(s), Proposed investment amount, B or C share	Investment time horizon, Reason for share class purchase, Missing client signature/signature date Missing FINRA expense analyzer, Missing SSN

Directly Held Business NIGOs

NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
<p>Missing or Incomplete Variable Annuity Addendum</p>	<p>The Variable Annuity Addendum must be submitted when completing a non-VAOE eligible application. This form satisfies the broker-dealer's compliance and supervisory obligations under FINRA Rule 2330 and provides more comprehensive and targeted protection to investigators regarding deferred variable annuity sales.</p>	<p>Not applicable</p>	<p>Representative Statement of Variable Annuity Addendum, Client name, Product name, Missing registered representative signature/signature date</p>	<p>Client Statement of Variable Annuity Addendum, Missing information, Missing client signature/signature date</p>
<p>Missing or Incomplete Addendum for 529 Plans and ABLE Accounts</p>	<p>The Addendum for 529 Plans and ABLE Accounts must be submitted when a new 529 Plan account or ABLE account is established. This form satisfies the Municipal Rulemaking Board (MSRB) requirement to gather suitability information on the beneficiary of a 529 plan account or ABLE account.</p>	<p>Not applicable</p>	<p>Missing form, Suitability questions, Missing registered representative signature/signature date</p>	<p>Missing client SSN, Reason for out-of-state plan purchase</p>

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Missing Ancillary Documents

NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
Missing Plan Documents	A copy of the complete plan document is required when establishing new plan accounts.	Not applicable	Missing form, Effective date of plan, Phone number, Employer name, Mailing address, Instructions from any, all, or most trustees, Investment strategy, Description if yes, Authorized individuals' name, title, date of birth, legal address, "I am" or "I am not" questions	TIN, SSN, Authorized individuals, Missing signature, Signature date
Missing Trust Documents	To establish a trust account, MMLIS requires a copy of the title page, investment power section, and signature page, or the MMLIS Certification of Trust Form .	Not applicable	Missing form, Trust name, Effective date of trust, Phone number, Mailing address, Any, all, or most trustees, Investment strategy, Description if yes, Trustees, Client name, Date of birth, Signature date, Address, Employer, Occupation, FINRA affiliation	SSN, TIN, Trustee signature, Signature date

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NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
Missing Corporate Resolution	To establish a corporate account, MMLIS requires a copy of the signed Corporate Resolution with the raised corporate seal.	Not applicable	Missing form, Corporation, Board of Directors date, Organization state, Seal date, Name of corporate secretary, Authorized individuals' name, date of birth, legal address, and/or "I am" or "I am not" questions	Signature of corporate secretary, Authorized individuals' SSN, signature, and/or signature date
Missing POA Documentation	To establish a Power of Attorney (POA) on an account, MMLIS requires a copy of the legal Power of Attorney dated within three years.	Not applicable	Registered representative will be contacted to provide supplemental documentation.	Not applicable
Missing Estate Documentation	To establish an estate account, MMLIS requires a copy of the letters of testamentary, which name the executor of the estate.	Not applicable	Registered representative will be contacted to provide supplemental documentation.	Not applicable
Missing LLC Documentation	To establish a Limited Liability Company (LLC) account, MMLIS requires a copy of the LLC Operating Agreement, Articles of Incorporation, or the MML Entity Certification Form .	Not applicable	Registered representative will be contacted to provide supplemental documentation, missing form, date of organization, state of organization, type of entity, good standing, mailing address, authorized individuals' name, title, date of birth, legal address, and I am or I am not questions.	SSN, Entity TIN, Authorized individual's Signature/signature date

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NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
Missing Partnership Agreement	To establish a Partnership account, MMLIS requires a copy of the Partnership Agreement or MML Entity Certification Form .	Not applicable	Registered representative will be contacted to provide supplemental documentation, missing form, date of organization, state of organization, type of entity, good standing, and mailing address.	SSN, Entity TIN, Authorized individual's Signature/ignature date
Missing Guardian / Conservatorship Documentation	In order to establish a guardian/conservatorship account, MMLIS requires a copy of the court-appointed document.	Not applicable	Registered Representative will be contacted to provide supplemental documentation.	Not applicable
Missing Non-Profit Organization Documentation	In order to establish a nonprofit organization account, MMLIS requires a copy of the Articles of Incorporation or MML Resolution of Governing Body.	Not applicable	Registered representative will be contacted to provide the missing supplemental documentation, organization name, type of organization, organized state, and adopted date.	Authorized individuals, SSN and signature, Certifying individual's signature/ignature date
Missing or Conflicting Information on Variable Annuity Transaction Summary (VATS) – VAOE only	The VATS Form replaces the Investor Account Form, Transaction Detail Form, Replacement Form, Suitability Checklist , and Variable Annuity Addendum for electronic orders. Since the VATS Form directly reflects the electronic order in VAOE, any changes will require	Not applicable	Not applicable	Not applicable

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NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
	the VAOE order to be re-worked and a new VATS form signed by the client.			
Missing RightBRIDGE Product Profiler (Retail clients)	The RightBRIDGE Product Profiler is a requirement to help assess Best Interest products. This document must be present with all retail client cases and kept in client file. (If the proposed product is yellow, the Product Profiler Documentation Form is optional.	Not applicable	Registered representative will be contacted to provide supplemental documentation.	Not applicable

Missing Form Elements

NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
Missing State Securities License	You must have a state securities license in every state where you conduct securities business.	Not applicable	Once licensed, all parties (including the client) are required to re-sign and date.	Client's signature
Missing Variable Product Appointment	You must obtain an appointment from this vendor in order to solicit and sell this product.	Not applicable	New document required, with updated information. NOTE! For VAOE submissions, a new order must be submitted.	New document required, with updated information. NOTE! For VAOE submissions, a new

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NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
				order must be submitted.
Missing Client Signature and/or Signature Date	MMLIS requires the signature of the client on all applicable paperwork, and the date signed, Copies maybe submitted to MMLIS, but some carriers may require original forms.	Not applicable	New document required, with updated information.	New document required, with updated information.
Missing Representative Signature and/or Signature Date	MMLIS requires the signature date and signature of the Registered Representative when a new account is opened.	Not applicable	New document required, with updated information.	New document required, with updated information.
Incorrect Date	All documentation received must be signed and dated within 60 days of receipt. If the signature dates are more than 60 days old, a new signature and date will need to be provided.	Not applicable	New document required, with updated information.	New document required, with updated information.

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NIGO Reason	Explanation	Resolution: Phone	Resolution: Case Manager	Resolution: Upload/DocuSign
Missing or Conflicting Information on Check; Unacceptable Monetary Instruments	MMLIS will not accept checks that do not contain a payee, client signature, date, amount, or discrepancy in amount (numeric vs. written amount). For information on proper check handling procedures, refer to the MMLIS Payment Guide on FieldNet.	Not applicable	Registered representative will be contacted, and check will be returned to Client's Address of Record for issuance of new check. Note: The NIGO must be resolved within 24 hours to avoid the check being returned.	Not applicable

Completing Paperwork

For all NIGO resubmissions with new paperwork required to be sent to MMLIS, the representative may complete the following steps:

1. Obtain all required forms from the Account Opening tool, or, if unavailable, the Practice360° Forms Library.
2. Ensure that all required fields on the forms are completed (no missing or incomplete information).
3. If applicable, verify supplemental form requirements are completed (no missing or incomplete information).
4. Ensure that client(s) and representative(s) have signed and dated all forms that require signatures. Signatures may be signed electronically via:
 - The **Sign & Submit** screen within the Account Opening tool
 - **eSignature within VAOE** – For Variable Annuity (VA) and Fixed Annuity (FA) submissions
 - **DidUSign** – For Variable Universal Life (VUL) submissions

Or via a wet signature with the signed forms scanned

NOTE!

- The client must sign and date before the representative(s).
- Signatures must be signed and dated within 60 days of business submission.

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Viewing the Status

In order to know the status of a NIGO submission once resubmitted, the registered representative may view the notification on the Works in Progress (WIP) page on Practice360° and will then complete any required actions.

The status of the submission may be viewed in the **Cases** tab within Practice360°. Upon MMLIS Home Office receipt of the account opening or broker-dealer change, a case(s) will be created within the Advisor360° platform. The case information includes the Home Office processing status of the submitted request and notes on any additional information that is needed.

Tip! A snapshot showing the last 7 days of case statuses can be viewed in the **Cases** widget available on the Advisor360° dashboard.

The three case categories include:

Case Category	Description
Work In Progress	All new case submissions that MMLIS Home Office has received and that are in process. Open cases remain in this status until complete.
Follow Up Required	Cases that are NIGO or that cannot be processed until additional information and/or documentation needed to close the case is provided to the MMLIS Home Office.
Work Completed	Cases that are fully completed and/or cancelled and closed cases.

To learn more about Cases, refer to the [Practice360° Cases Reference Guide](#).

For submission information, refer to the [MMLIS Contact List](#).