SUMMARY OF CHANGES FROM CSPN DISCLOSURE PRINCIPLES STATEMENT NO. 5 TO CSPN DISCLOSURE PRINCIPLES STATEMENT NO. 6

The following is an outline of key changes and improvements made to CSPN's Disclosure Principles:

GENERAL

- 1. DP6 has been reorganized to make the principles easier to understand.
- 2. DP6 has been rewritten in plain English.

SECTION BY SECTION KEY CHANGES

- 1. *Introduction:* added language to state that while DP6 is not applicable, pre-paid plans and ABLE plans may find the guidance contained in DP6 useful.
- 2. Offering Materials: added statement that Offering Materials may include supplements.
- 3. Updating the Offering Materials: added language that State Issuers should consider whether multiple supplements should be consolidated and or the Offering Materials be updated as a whole; added language regarding timing of updates in response to DP6.
- 4. Specific Items to Include in the Offering Materials:
 - a. rewrote "Specific Disclosure Matters" into easier to follow sections;
 - *b.* restated "locator table" concept into a "Summary" that may take several different forms, including the current "locator table" format;
 - *c.* reorganized and consolidated items included in the summary; reorganized and rewrote disclaimers, now called "Notices";
 - d. Added a section entitled "Eligibility, Opening, Contributing to Maintaining and Withdrawing from an account";
 - e. Reorganized and renamed risk factors (formerly 3.I);
 - f. Updated language regarding fees and costs (formerly 3.F);
 - g. Updated language regarding investment options (formerly 3.H);
 - *h.* Updated language regarding investment option performance, including benchmarking (formerly 3.G); and
 - *i.* Updated language regarding federal tax and state tax and other laws (formerly 3.D and 3.E)