

TrustFlow360

Product Vision Document

See every risk. Never miss a deadline.

Version 1.0
January 2026
Start & Scale LLC

1. Executive Summary

TrustFlow360 is an AI-powered platform for Irrevocable Life Insurance Trust (ILIT) administration. It gives professional trustees a single dashboard to manage compliance, track deadlines, and automatically surface policy risks before they become liability.

Positioning

"See every risk. Never miss a deadline."

TrustFlow360 fills the gap between "do it yourself" spreadsheet tracking and expensive full-service outsourcing. It combines workflow automation with AI-powered policy monitoring to deliver professional-grade ILIT management at software prices.

2. Market Context & Gap

Market Size

- Approximately 3 million life insurance policies in the US require ILIT administration
- Trust Account Management Software market: \$881M (2025) growing to \$1.28B by 2032
- Market is highly fragmented with no dominant technology solution

The Problem: Hidden Liability

ILIT trustees face a dual burden that existing solutions fail to address:

1. Administrative Overhead

- Premium tracking and payment coordination
- Crummey notice generation and delivery tracking
- Gift coordination with grantors
- Withdrawal period monitoring
- Form 709 gift tax reporting coordination
- Beneficiary communications

2. Latent Policy Risk

The more dangerous problem is what trustees cannot see:

- 48% of policies require remediation (ITM 2025 data, up from 27.7% in 2022)
- 39% of non-guaranteed UL policies are projected to lapse during insured's lifetime
- 90% of ILIT policies are managed by non-professional trustees with no monitoring
- Insurance carriers do not proactively warn trustees of underperforming policies

The Stakes: Fiduciary Liability

Trustees are personally liable under the Uniform Prudent Investor Act (UPIA) for failing to monitor and manage life insurance as they would any other trust asset. Case law confirms:

- *Rafert v. Meyer*: Trustee liability for policy lapse; duty to inform beneficiaries cannot be waived
- One major law firm paid \$5M+ settlement for inadequate policy monitoring advice
- Fiduciary duties cannot be waived by trust language

Competitive Landscape

| Player | Model | Limitation |
|--------------------|---------------------|----------------------------|
| ITS / LITCO / ITM | Service bureau | Expensive; doesn't scale |
| CrummeyService.com | Basic SaaS workflow | Outdated (2016); no AI |
| Proformex | Policy monitoring | No compliance workflow |
| WealthHub | Trust CRM | Generic; not ILIT-specific |

The Gap

No platform currently combines:

- AI-powered document processing and policy health monitoring
- End-to-end compliance workflow automation
- Audit trail that protects trustees from liability

This is the gap TrustFlow360 fills.

3. Ideal Customer Profile (ICP)

Primary User

Professional trustees managing multiple ILITs who are personally on the hook for fiduciary compliance:

- Estate planning attorneys
- Certified Financial Planners (CFPs)
- Wealth managers and RIAs
- Trust officers at regional banks
- Anyone in the trustee seat responsible for ILIT administrative and compliance obligations

Secondary User (Future)

Grantors, policyholders, and beneficiaries seeking visibility into trust status via a read-only portal. This is a GTM sweetener for enterprise sales, not a v1 priority.

Portfolio Size

Target trustees managing 10-500+ ILITs. Solo practitioners with 1-5 trusts may use the platform but are not the primary acquisition target.

4. Product Vision

Core Value Proposition

TrustFlow360 gives ILIT trustees a single dashboard to manage compliance, track deadlines, and automatically surface policy risks before they become liability.

The "Only We" Statement

TrustFlow360 is the only platform that combines AI-powered document extraction, predictive policy health monitoring, automated Crummey compliance workflows, and end-to-end audit trail protection in a single dashboard purpose-built for ILIT trustees.

Annual ILIT Compliance Cycle

The platform orchestrates the complete annual ILIT administration workflow:

| Phase | Trigger | System Does | User Does |
|-----------------------|--------------------------|---------------------------------------------------------|-----------------------------------------|
| 1. Premium Alert | 90 days before due | Surfaces upcoming premium; flags if underfunded | Reviews; confirms funding source |
| 2. Gift Coordination | User confirms | Generates contribution request; tracks receipt | Sends to grantor; uploads deposit proof |
| 3. Crummey Compliance | Gift received | Auto-generates notices; tracks delivery; starts clock | Reviews/approves; sends notices |
| 4. Withdrawal Lapse | 30 days pass | Logs lapse; unlocks funds for payment | Confirms no withdrawals |
| 5. Premium Payment | Funds cleared | Generates payment instruction; logs transaction | Pays carrier; uploads confirmation |
| 6. Policy Health | Annual / on-demand | AI analyzes performance; flags remediation | Reviews alerts; decides action |
| 7. Remediation | Health check flags issue | Presents options; models outcomes | Selects path; triggers new cycle |
| 8. Reporting | End of cycle | Generates trustee report; gift tax summary; audit trail | Downloads/shares with stakeholders |

5. V1 Scope & Priorities

Build Philosophy

Build the full workflow as the architecture, but launch with depth in the highest-pain phases first. The compliance cycle is interdependent; a wedge approach would force parallel systems and break the audit trail.

V1 Feature Depth

| Phase | V1 Depth | Rationale |
|-------------------------|------------|------------------------------------------------|
| 1. Premium Alert | Full | Table stakes; trigger for everything |
| 2. Gift Coordination | Full | Directly tied to Crummey compliance |
| 3. Crummey Compliance | Full | Highest liability exposure; most manual today |
| 4. Withdrawal Lapse | Full | Simple; required for audit trail |
| 5. Premium Payment | Basic | Tracking only; no carrier integration yet |
| 6. Policy Health Check | AI-Powered | Core differentiator; "sees what you can't" |
| 7. Remediation Workflow | Light | Surface problem + options; V2 = model outcomes |
| 8. Reporting | Basic | Exportable audit trail; pretty reports V2 |

6. Onboarding Flow

AI Document Upload as Conversion Driver

The platform features an AI-powered document parser as the primary onboarding hook. Users upload ILIT trust documents, life insurance policies, or other relevant files, and the system extracts key data to demonstrate value immediately.

Gated PLG Model

To manage regulatory and data privacy risk, document upload requires account creation first:

- Homepage hook: "See TrustFlow360 in action"
- Option 1: "Try with a sample trust" (demo mode with pre-loaded docs; no PII)
- Option 2: "Upload your own document" (requires free account + ToS acceptance)
- Post-signup: Full AI extraction with richer output; document storage; compliance workflow begins

Terms of Service Requirements

ToS must include comprehensive disclaimers:

- Platform provides document extraction, not legal/insurance/financial advice
- User assumes all responsibility for decisions based on extracted data
- User affirms they are authorized to upload documents
- Clear data handling and retention policies

Regulatory Considerations

Prior to launch, consult fintech/insurtech counsel (\$500-1,500) to confirm:

- Document extraction does not constitute unauthorized practice of law
- Policy analysis presentation does not require insurance licensing
- Disclaimer language provides adequate safe harbor

7. Pricing Model

Tiered Flat Rate Pricing

Simple, predictable pricing based on portfolio size:

| Tier | Trust Count | Target User |
|---------------------|---------------|-----------------------------------------|
| Starter | 1-49 trusts | Solo practitioners, individual trustees |
| Professional | 50-199 trusts | Small firms, boutique trust companies |
| Enterprise | 200+ trusts | Banks, large trust companies, RIAs |

Pricing Rationale

- Tiered flat rate is simple to explain and predictable for buyers
- Captures more value at lower tiers vs. pure per-trust pricing
- Enterprise tier allows custom pricing for large accounts
- Per-trust overage fees can be added later if needed
- Freemium can be explored post-PMF for downmarket expansion

8. Open Questions & Future Phases

V2+ Roadmap Considerations

- Beneficiary/grantor portal (read-only trust status visibility)
- Carrier integrations for automated premium payment
- Advanced remediation modeling (1035 exchange analysis, life settlement valuation)
- Multi-user permissions and workflow approvals
- White-label option for enterprise trust companies
- Integration with trust accounting systems

Technical Decisions

- AI model selection for document extraction (current: Gemini 2.5 Flash)
- Policy health monitoring data sources and refresh frequency
- Notification delivery (email, SMS, in-app)
- SOC 2 compliance timeline

GTM Questions

- Launch pricing points for each tier
- Early adopter / design partner identification
- Content marketing strategy (ILIT compliance education)
- Partnership opportunities (bar associations, CFP organizations)

9. Summary

TrustFlow360 addresses a clear market gap: professional ILIT trustees need modern tooling that reduces administrative burden while protecting them from fiduciary liability. Existing solutions are either expensive service bureaus or outdated workflow tools that miss the deeper policy risk problem.

The platform combines:

- Complete ILIT compliance workflow automation
- AI-powered document extraction and policy health monitoring
- End-to-end audit trail for fiduciary protection

V1 delivers the full compliance cycle with concentrated depth in Crummey compliance and AI-powered policy health monitoring. The gated PLG onboarding flow (document upload after signup) balances conversion optimization with regulatory prudence.

Tiered flat-rate pricing (Starter / Professional / Enterprise) provides predictable costs for buyers and scales with portfolio size.

See every risk. Never miss a deadline.

Document prepared by: Christopher Smith, Start & Scale LLC
January 22, 2026