

State: Virginia **Filing Company:** Continental General Insurance Company
TOI/Sub-TOI: LTC Annual Rate Report/LTCINLM
Product Name: Long Term Care
Project Name/Number: 2018 SCI RS VA ARC/

Filing at a Glance

Company: Continental General Insurance Company
Product Name: Long Term Care
State: Virginia
TOI: LTC Annual Rate Report
Sub-TOI: LTCINLM
Filing Type: LTC Annual Rate Report
Date Submitted: 06/28/2018
SERFF Tr Num: GLTC-131518986
SERFF Status: Closed-Filed
State Tr Num: GLTC-131518986
State Status: Filed
Co Tr Num: 2018 SCI RS VA ARC

Implementation
Date Requested:
Author(s): Deborah Keeler, Stephanie Entzminger, Beth Lovaas, Natalie Higgins, Eric Coldewey, Kenneth Wade, Elizabeth Burchfield, Ryan Huntley
Reviewer(s): Bill Dismore (primary), Colleen Moore
Disposition Date: 10/02/2018
Disposition Status: Filed
Implementation Date:

State: Virginia
TOI/Sub-TOI: LTC Annual Rate Report/LTCINLM
Product Name: Long Term Care
Project Name/Number: 2018 SCI RS VA ARC/
Filing Company: Continental General Insurance Company

General Information

Project Name: 2018 SCI RS VA ARC

Project Number:

Requested Filing Mode:

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Deemer Date:

Submitted By: Eric Coldewey

Status of Filing in Domicile: Not Filed

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Filing Status Changed: 10/02/2018

State Status Changed: 10/02/2018

Created By: Eric Coldewey

Corresponding Filing Tracking Number:

State TOI: LTC Annual Rate Report 2018

Filing Description:

Dear Sir or Madam,

Policy forms L-6000-NQ-VA, L-6000-TQ-VA, LTC-020201-UTA-NQ-VA, and LTC-020201-UTA-TQ-VA have active lives in your state as of 12/31/2017.

An annual rate filing demonstrating compliance with regulation 14VAC5-200-125 of the Virginia Administrative Code is enclosed for your review for policy forms L-6000-NQ-VA, L-6000-TQ-VA, LTC-020201-UTA-NQ-VA, and LTC-020201-UTA-TQ-VA.

Thank you for reviewing the information provided herein; if you have additional questions, please feel free to contact me.

Sincerely,

Deborah A. Keeler, ASA, MAAA
Senior Associate Actuary
Continental General Insurance Company
11001 Lakeline Blvd, Suite 120
Austin, Texas 78717
Email: debby.keeler@continental-ins.com

Company and Contact

Filing Contact Information

Deborah Keeler, Senior Associate Actuary debby.keeler@continental-ins.com
11001 Lakeline Blvd. 512-410-0805 [Phone]
Suite 120 512-257-0218 [FAX]
Austin, TX 78717

State: Virginia

Filing Company: Continental General Insurance Company

TOI/Sub-TOI: LTC Annual Rate Report/LTCINLM

Product Name: Long Term Care

Project Name/Number: 2018 SCI RS VA ARC/

Filing Company Information

Continental General Insurance
Company
11001 Lakeline Blvd
Suite 120
Austin, TX 78717
(866) 830-0607 ext. [Phone]

CoCode: 71404
Group Code: 84
Group Name:
FEIN Number: 47-0463747

State of Domicile: Texas
Company Type: Life & Health
State ID Number:

Filing Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

State: Virginia Filing Company: Continental General Insurance Company
TOI/Sub-TOI: LTC Annual Rate Report/LTCINLM
Product Name: Long Term Care
Project Name/Number: 2018 SCI RS VA ARC/

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed	Bill Dismore	10/02/2018	10/02/2018

SERFF Tracking #:

GLTC-131518986

State Tracking #:

GLTC-131518986

Company Tracking #:

2018 SCI RS VA ARC

State: Virginia
 TOI/Sub-TOI: LTC Annual Rate Report/LTCINLM
 Product Name: Long Term Care
 Project Name/Number: 2018 SCI RS VA ARC/

Filing Company: Continental General Insurance Company

Disposition

Disposition Date: 10/02/2018

Implementation Date:

Status: Filed

Comment:

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Continental General Insurance Company	0.000%	0.000%	\$0	19	\$26,087	0.000%	0.000%

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Actuarial Memorandum	Received & Acknowledged	Yes
Supporting Document	Product Checklist	Received & Acknowledged	Yes
Supporting Document	LTC Annual Report Instructions	Received & Acknowledged	Yes
Supporting Document	Plan of Action	Received & Acknowledged	Yes
Rate	LTCINLM	Filed	Yes

SERFF Tracking #:

GLTC-131518986

State Tracking #:

GLTC-131518986

Company Tracking #:

2018 SCI RS VA ARC

State:

Virginia

Filing Company:

Continental General Insurance Company

TOI/Sub-TOI:

LTC Annual Rate Report/LTCINLM

Product Name:

Long Term Care

Project Name/Number:

2018 SCI RS VA ARC/

Rate Information

Rate data applies to filing.

Filing Method:

SERFF

Rate Change Type:

Neutral

Overall Percentage of Last Rate Revision:

%

Effective Date of Last Rate Revision:

Filing Method of Last Filing:

SERFF

SERFF Tracking Number of Last Filing:

GLTC-131101755

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Continental General Insurance Company	0.000%	0.000%	\$0	19	\$26,087	0.000%	0.000%

SERFF Tracking #:

GLTC-131518986

State Tracking #:

GLTC-131518986

Company Tracking #:

2018 SCI RS VA ARC

State:

Virginia

Filing Company:

Continental General Insurance Company

TOI/Sub-TOI:

LTC Annual Rate Report/LTCINLM

Product Name:

Long Term Care

Project Name/Number:

2018 SCI RS VA ARC/

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		LTCINLM	L-6000-NQ-VA, L-6000-TQ-VA, LTC-020201-UTA-NQ-VA, LTC-020201-UTA-TQ-VA	Other	Previous State Filing Number: GLTC-131101755 Rate Action Other Explanation: Annual Rate Filing	SCI Post-Rate Stability Transmittal Form.pdf,

**Annual Rate Report for Long-Term Care Insurance Policies
Issued On or After October 1, 2003 that are No Longer Marketed**

[14 VAC 5-200-125 A 1 a. \(2\)](#)

Reporting Period 12/31/2017

Company Name	Continental General Insurance Company
Company NAIC Number	71404
Form Number(s)	L-6000-NQ-VA, L-6000-TQ-VA, LTC-020201-UTA-NQ-VA, LTC-020201-UTA-TQ-VA
Issue Date(s)	8/19/2004 – 2/22/2007
SERFF Filing Number	GLTC-131518986
Prior SERFF Filing Number(s)	GLTC-130623570, GLTC-130563086, GLTC-129176555, GLTC-131101755

I, Deborah Keeler, am a member of the American Academy of Actuaries. I meet the Academy's qualification standards for rendering this opinion and am familiar with the requirements for filing and reviewing long-term care insurance premiums.

In my opinion:

The premium rate schedule(s) are not sufficient to cover anticipated costs under best estimate assumptions and the premium rate schedule(s) may not be reasonably expected to be sustainable over the life of the policies with no future premium increases anticipated. Based on my review of recent experience of the policies, in my opinion, a rate action is necessary at this time as a result of this analysis. A plan of action will be submitted to the commission within 60 days of this certification. It is understood that the plan of action does not necessarily require an immediate rate action.

In forming my opinion, I have used actuarial assumptions and actuarial methods and such tests of the actuarial calculations as I considered necessary. The details of my review are included in the attached actuarial memorandum that provides the historical experience and the expected future and lifetime loss ratios based on the current best-estimate assumptions; and a detailed description and actuarial support for each assumption used in the projections.



Deborah Keeler, ASA, MAAA
11001 Lakeline Blvd, Suite 120 Austin, TX 78717
512-410-0805
6/27/2018

SERFF Tracking #:

GLTC-131518986

State Tracking #:

GLTC-131518986

Company Tracking #:

2018 SCI RS VA ARC

State:

Virginia

Filing Company:

Continental General Insurance Company

TOI/Sub-TOI:

LTC Annual Rate Report/LTCINLM

Product Name:

Long Term Care

Project Name/Number:

2018 SCI RS VA ARC/

Supporting Document Schedules

Satisfied - Item:	Actuarial Memorandum
Comments:	
Attachment(s):	SCI Annual Rate Filing Cover Letter.pdf SCI Annual Rate Filing.pdf SCI Exhibits.pdf
Item Status:	Received & Acknowledged
Status Date:	10/02/2018
Bypassed - Item:	Product Checklist
Bypass Reason:	N/A; This is an annual rate filing.
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	10/02/2018
Satisfied - Item:	LTC Annual Report Instructions
Comments:	We have reviewed the "Instructions for Annual Rate Reports" document found in the link above.
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	10/02/2018
Satisfied - Item:	Plan of Action
Comments:	
Attachment(s):	SCI Plan of Action.pdf
Item Status:	Received & Acknowledged
Status Date:	10/02/2018



June 27, 2018

Bureau of Insurance
P.O. Box 1157
Richmond, VA 23218-1157

RE: Continental General Insurance Company
NAIC No: 71404 FEIN No: 47-0463747
Annual Rate Filing

Dear Sir or Madam,

Policy forms L-6000-NQ-VA, L-6000-TQ-VA, LTC-020201-UTA-NQ-VA, and LTC-020201-UTA-TQ-VA have active lives in your state as of 12/31/2017.

An annual rate filing demonstrating compliance with regulation 14VAC5-200-125 of the Virginia Administrative Code is enclosed for your review for policy forms L-6000-NQ-VA, L-6000-TQ-VA, LTC-020201-UTA-NQ-VA, and LTC-020201-UTA-TQ-VA.

Thank you for reviewing the information provided herein; if you have additional questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'D Keeler'. The signature is fluid and cursive, with the first letter 'D' being particularly large and stylized.

Deborah A. Keeler, ASA, MAAA
Senior Associate Actuary
Continental General Insurance Company
11001 Lakeline Blvd, Suite 120
Austin, Texas 78717
Email: debby.keeler@continental-ins.com

Administration for:
Great American Life Insurance Company®
Loyal American Life Insurance Company®

P.O. Box 203098 | Austin, TX 78720-3098
Toll Free: (866) 830-0607 | Fax: (888) 769-0737

Continental General Insurance Company
P.O. Box 203098
Austin, Texas 78720-3098

Actuarial Memorandum for Virginia Annual Rate Filing

Continental General Insurance Company
Individual Long Term Care Insurance Base Policy Forms and Riders Associated with
L-6000-NQ-VA, L-6000-TQ-VA, LTC-020201-UTA-NQ-VA, and LTC-020201-UTA-TQ-VA

I. PURPOSE OF FILINGS

The purpose of this memorandum is to provide the historical experience and the expected future and lifetime loss ratios based on the current best-estimate assumption as required by regulation 14VAC5-200-125 of the Virginia Administrative Code for the above referenced policy forms.

L-6000 policies were originally sold under the name Loyal American Life Insurance Company (Loyal), while LTC-020201 policies were originally sold under the name United Teacher Associates Insurance Company (UTA). Virtually all of the Loyal policies have been novated into UTA, and the remaining Loyal policies are 100% ceded to UTA. All policies issued in Florida are 100% ceded to Great American Life Insurance Company (GALIC) and therefore are excluded from this analysis. Effective December 31, 2016, UTA (inactive NAIC No: 63479) merged into Continental General Insurance Company (active NAIC No: 71404).

As shown in Section III below, the projected lifetime loss ratio for all benefits is 72.9%.

These products are Guaranteed Renewable, Individual Long-Term Care policies. This annual filing is not intended to be used for other purposes. No rate increase is being requested on these products through this filing.

II. PROJECTION ASSUMPTIONS

The updated projections of premium and claims used the following assumptions.

INTEREST

A 5.0% annual rate of interest has been assumed for accumulating historical experience and for discounting projected future experience to present values.

MORBIDITY

The morbidity assumptions are based on a combination of the Company's historical claim experience on these forms from 2005 through 6/30/2016, the Milliman *2014 Long-Term Care Guidelines (Guidelines)* and judgment. The *Guidelines* reflect over \$25 billion of insured data and the experience and judgment of Milliman actuaries. The claim cost assumptions reflect the Company's current best estimate of future morbidity. In setting the morbidity assumptions, the policy design, underwriting and claim adjudication practices have been taken into consideration. The baseline assumptions do not include any loads for moderately adverse experience or future morbidity improvement.

MORTALITY

The best estimate future mortality assumption is 100% of the Annuity 2000 Basic Table with mortality steepening factors applied, historical mortality improvement, and selection factors. Historical mortality improvement was assumed equal to 0.6% per year, with 2000 as the central year. The mortality assumption, including selection factors and historical mortality improvement, is based on industry expectations.

VOLUNTARY LAPSE

The voluntary lapse assumptions were developed from a policy persistency study conducted on the Company's experience on these forms and judgment. Lapse rates are combined with mortality rates to derive the total termination rate. In addition, benefit exhaust rates were calculated and added, to reflect certificate termination when a person exhausts his benefit period. We assumed all remaining certificates would terminate at attained age 115. The lapse assumptions represent the best estimate expectations of future experience and do not include any provisions for adverse experience. Voluntary lapse rates vary by marital status and inflation versus non-inflation. The table below shows the detailed voluntary lapse assumptions for the applicable projected policy durations.

Voluntary Lapse Rate				
Duration	Married		Single	
	Inflation	Non-Inflation	Inflation	Non-Inflation
7	0.98%	1.16%	1.97%	2.57%
8	0.73%	1.16%	1.97%	2.25%
9	0.49%	1.16%	1.97%	2.25%
10	0.49%	1.16%	1.97%	2.25%
11	0.44%	1.05%	1.77%	2.02%
12	0.39%	0.93%	1.57%	1.80%
13	0.34%	0.81%	1.38%	1.57%
14	0.29%	0.70%	1.18%	1.35%
15+	0.24%	0.58%	0.98%	1.12%

Additional multiplier to apply to Lapse Rates for Gender	
Gender	Multiplier
Female	85.0%
Male	135.0%

For limited pay policies, voluntary lapse rates were assumed to be zero after the premium payment period.

CLAIM RESERVES

The incurred claims shown in the nationwide historical experience include paid claims, DLR, ICOS, and IBNR.

III. LIFETIME LOSS RATIO

The Company's nationwide experience has been accumulated through 12/31/2017. The projected future experience uses reasonable assumptions based on the Company's past experience with long term care policies. **Exhibit 1** presents the historical and projected future experience for these policy forms and riders. All projected experience beyond 2047 is included in 2048+.

The present values of earned premium and incurred claims, discounted at 5% are summarized below. The lifetime anticipated loss ratio is defined as the present value of the historical and projected future claims divided by the present value of the historical and projected future earned premiums.

Present Values as of 12/31/2017

Nationwide	Earned Premium	Incurred Claims	Loss Ratio
Historical	201,865,941	41,135,273	20.4%
Projected Future	149,900,829	215,158,799	143.5%
Lifetime Anticipated	351,766,770	256,294,071	72.9%

IV. ACTUAL-TO-EXPECTED ANALYSIS

Please see the attached **Exhibit 2** and **Exhibit 3**. These exhibits demonstrate actual-to-expected ratios resulting from the experience study which supports the assumptions described above. Exhibit 2 contains a comparison of actual to expected termination experience, and Exhibit 3 contains a comparison of actual to expected morbidity experience.

V. RATE INCREASE HISTORY

There have been no prior rate increases approved on these forms in Virginia.

VI. NUMBER OF LIVES INFORCE

As of 12/31/2017, there were 8,307 premium-paying policies with these forms inforce nationwide, and 19 premium-paying policies with these forms in Virginia.

VII. ACTUARIAL CERTIFICATION

The purpose of this memorandum is to provide the historical experience and the expected future and lifetime loss ratios based on the current best-estimate assumption as required by regulation 14VAC5-200-125 of the Virginia Administrative Code for the above referenced policy forms.

I, Deborah Keeler, am an Associate of the Society of Actuaries and a Member of the American Academy of Actuaries, and I meet the Academy's Qualification Standards to render the actuarial opinion contained herein.



Deborah A. Keeler, ASA, MAAA
Senior Associate Actuary
Continental General Insurance Company
11001 Lakeline Blvd, Suite 120
Austin, Texas 78717

Exhibit 1
Continental General Insurance Company
Policy Form: L-6000, LTC-020201
Nationwide
Historical and Projected Future Experience

As of 12/31/2017

Year	Earned Premium	Incurred Claims	Loss Ratio
2003	84,445	-	0.0%
2004	656,053	2,853	0.4%
2005	1,705,147	38,747	2.3%
2006	4,037,630	192,833	4.8%
2007	7,656,261	282,166	3.7%
2008	11,152,279	1,177,931	10.6%
2009	13,597,969	1,218,941	9.0%
2010	14,739,451	1,377,067	9.3%
2011	14,348,762	2,292,118	16.0%
2012	14,161,935	2,310,861	16.3%
2013	13,964,720	3,057,810	21.9%
2014	13,917,264	3,601,125	25.9%
2015	13,885,091	4,150,445	29.9%
2016	13,854,425	7,598,852	54.8%
2017	14,782,453	7,252,399	49.1%
2018	15,481,756	6,474,316	41.8%
2019	15,342,800	7,301,055	47.6%
2020	15,012,538	8,174,571	54.5%
2021	14,505,033	9,131,000	63.0%
2022	13,950,193	10,136,623	72.7%
2023	13,366,963	11,184,778	83.7%
2024	12,752,106	12,271,697	96.2%
2025	12,105,698	13,363,102	110.4%
2026	11,432,040	14,413,190	126.1%
2027	10,737,421	15,413,668	143.6%
2028	10,028,637	16,374,659	163.3%
2029	9,312,426	17,284,892	185.6%
2030	8,596,001	18,091,021	210.5%
2031	7,886,731	18,735,188	237.6%
2032	7,191,210	19,191,481	266.9%
2033	6,515,596	19,490,573	299.1%
2034	5,864,916	19,623,034	334.6%
2035	5,243,167	19,523,592	372.4%
2036	4,653,707	19,137,179	411.2%
2037	4,099,259	18,476,909	450.7%
2038	3,582,103	17,604,373	491.5%
2039	3,104,243	16,557,714	533.4%
2040	2,667,142	15,368,078	576.2%
2041	2,271,581	14,083,693	620.0%
2042	1,917,357	12,739,797	664.4%
2043	1,603,560	11,382,814	709.8%
2044	1,328,772	10,037,548	755.4%
2045	1,091,004	8,748,490	801.9%
2046	887,755	7,554,538	851.0%
2047	715,999	6,463,965	902.8%
2048+	2,231,957	25,471,456	1141.2%

Present Values at 5.0%

Nationwide	Earned Premium	Incurred Claims	Loss Ratio
Historical	201,865,941	41,135,273	20.4%
Projected Future	149,900,829	215,158,799	143.5%
Lifetime Anticipated	351,766,770	256,294,071	72.9%

Exhibit 2
Persistency Study
Continental General Insurance Company

Experience by Policy Duration

Policy Duration	Total Lives	Total Terminations	Expected Terminations	Actual Termination Rate	Expected Termination Rate	Actual to Expected
1 to 3	57,355	2,677	2,687	4.7%	4.7%	99.6%
4 to 6	71,796	1,739	2,121	2.4%	3.0%	82.0%
7 to 9	61,370	1,552	1,806	2.5%	2.9%	85.9%
10 to 12	40,778	1,531	1,526	3.8%	3.7%	100.3%
13+	37,376	2,718	2,303	7.3%	6.2%	118.0%
Total	268,674	10,217	10,443	3.8%	3.9%	97.8%

Experience by Attained Age

Attained Age	Total Lives	Total Terminations	Expected Terminations	Actual Termination Rate	Expected Termination Rate	Actual to Expected
Less than 50	4,075	495	169	12.1%	4.2%	292.3%
50-59	22,323	928	753	4.2%	3.4%	123.2%
60-69	94,709	2,068	2,673	2.2%	2.8%	77.4%
70-79	96,997	2,457	3,007	2.5%	3.1%	81.7%
80+	50,571	4,269	3,840	8.4%	7.6%	111.2%
Total	268,674	10,217	10,443	3.8%	3.9%	97.8%

Notes:

- 1) Experience Periods: Loyal = 2002 through 6/30/2016, UTA = 2005 through 6/30/2016
- 2) Total Terminations include Actual Deaths, Actual Lapses, and Actual Benefit Exhaustions.
- 3) Expected terminations include Actual Benefit Exhaustion, Expected Deaths, and Expected Lapses.
- 4) Expected Deaths are based on the Annuity 2000 Basic Table with mortality steepening factors applied, historical mortality improvement, and selection factors.
- 5) Expected Lapses vary based on company, inflation benefit option, spousal discount, and gender.
- 6) All premium payment options are included in the above data.

Exhibit 3
Claim Study
Continental General Insurance Company
L-6000, LTC-020201

Experience by Policy Duration

Policy Duration	Total Lives	Actual Claim Count	Actual Incurred Claims	Expected Incurred Claims	Actual to Expected
1	13,047	11	386,149	627,270	62%
2	12,297	15	564,037	1,114,258	51%
3	11,844	16	1,134,306	1,469,511	77%
4	11,367	36	2,173,311	1,904,096	114%
5	11,053	47	3,210,454	2,401,466	134%
6	10,805	40	1,979,093	3,006,795	66%
7	10,298	53	4,104,363	3,717,485	110%
8	8,607	50	3,627,990	4,049,600	90%
9	6,692	47	2,906,791	3,977,553	73%
10	4,059	65	4,264,596	3,200,221	133%
11	1,969	43	2,397,137	2,111,828	114%
12	798	18	1,241,041	1,161,143	107%
13	227	7	408,010	418,155	98%
14	8	0	5,848	16,105	36%
Total	103,072	449	28,403,125	29,175,486	97%

Experience by Year

Calendar Year	Total Lives	Actual Claim Count	Actual Incurred Claims	Expected Incurred Claims	Actual to Expected
2003	138	-	-	23,001	0%
2004	813	1	3,072	97,831	3%
2005	1,915	9	66,467	236,832	28%
2006	3,945	12	429,276	458,017	94%
2007	6,936	8	346,274	763,412	45%
2008	9,377	25	1,501,769	1,151,987	130%
2009	10,826	40	1,753,441	1,585,082	111%
2010	11,407	36	2,551,909	2,078,708	123%
2011	11,025	32	2,592,648	2,621,748	99%
2012	10,788	43	3,090,961	3,257,476	95%
2013	10,550	62	3,991,638	3,917,806	102%
2014	10,307	68	4,156,258	4,629,296	90%
2015	10,091	70	4,433,014	5,365,631	83%
2016	4,953	43	3,486,399	2,988,659	117%
Total	103,072	449	28,403,125	29,175,486	97%

Notes:

- 1) Experience from 2003 through 6/30/2016.
- 2) Actual incurred claims are defined as the sum of paid claims and reserves.
 Paid claims represent the present value of paid claims discounted to the claim incurred date.
 Reserve amounts represent the present value of the remaining claim reserve (including IBNR) discounted to the claim incurred date.
- 3) Expected incurred claims are based on the Milliman 2014 *Long-Term Care Guidelines* (including Product Factors).
- 4) Claim dollar amounts are discounted using a 4.50% interest rate (both actual and expected).
- 5) The expected incurred claims do include a credibility adjustment.
 Please note that claim experience related to this policy form grouping is considered 64.4% credible.

Continental General Insurance Company
Policy Forms: L-6000-NQ-VA, L-6000-TQ-VA, LTC-020201-UTA-NQ-VA, LTC-020201-UTA-TQ-VA
Plan of Action

Given experience on the above-referenced forms as of 12/31/2017, we have certified to the following:

Certification

The premium rate schedules are not sufficient to cover anticipated costs under best estimate assumptions and the premium rate schedules may not be reasonably expected to be sustainable over the life of the policies with no future premium increases anticipated.

Pursuant to 14VAC5-200-125.A.1.a.(2)(b), we would like to propose a plan of action for the reestablishment of adequate margins for moderately adverse experience.

Plan of Action

The Company plans to submit a rate filing for the above-referenced policy forms to the Bureau within the next year. The rate increase requested in the filing will be the rate increase needed to provide the certification required per 14VAC5-200-153.B.2.a.