

State: Virginia **Filing Company:** Assurity Life Insurance Company
TOI/Sub-TOI: LTC Annual Rate Report/LTCINLM
Product Name: VA 2022 Assurity Annual Rate Report
Project Name/Number: /

Filing at a Glance

Company: Assurity Life Insurance Company
Product Name: VA 2022 Assurity Annual Rate Report
State: Virginia
TOI: LTC Annual Rate Report
Sub-TOI: LTCINLM
Filing Type: LTC Annual Rate Report
Date Submitted: 09/14/2022
SERFF Tr Num: LFCR-133399593
SERFF Status: Closed-Filed
State Tr Num: LFCR-133399593
State Status: Filed
Co Tr Num: VA 2022 LTCINLM AL2100

Effective: On Approval
Date Requested:
Author(s): Scarlett Nazari, Anoush Chngidakyan, Dianne Bowdish
Reviewer(s): Colleen Moore (primary)
Disposition Date: 11/28/2022
Disposition Status: Filed
Effective Date:

State: Virginia
TOI/Sub-TOI: LTC Annual Rate Report/LTCINLM
Product Name: VA 2022 Assurity Annual Rate Report
Project Name/Number: /

Filing Company: Assurity Life Insurance Company

General Information

Project Name:
Project Number:
Requested Filing Mode: Informational
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact:

Status of Filing in Domicile:
Date Approved in Domicile:
Domicile Status Comments:
Market Type: Individual
Individual Market Type:
Filing Status Changed: 11/28/2022
State Status Changed: 11/28/2022
Created By: Dianne Bowdish
Corresponding Filing Tracking Number:
State TOI: LTC Annual Rate Report 2022

Deemer Date:
Submitted By: Dianne Bowdish

Filing Description:

September 14, 2022

Virginia Bureau of Insurance - SCC
1300 East Main Street
Richmond, Virginia 23219

To Whom It May Concern:

Annual Rate Reporting under 14 VAC 5-200-125

In accordance with the annual rate-reporting requirement under 14 VAC 5-200-125, attached please find the requisite information on behalf of Assurity Life Insurance Company.

LifeCare Assurance Company is submitting this filing in its capacity as Third party administrator on behalf of Assurity Life Insurance Company. Attached is a letter authorizing LifeCare Assurance Company to submit the long-term care insurance filings on behalf of Assurity Life Insurance Company.

Please contact me if you have questions or require additional information.

Sincerely,

Xiaoyan Song, FSA, MAAA, FLMI, LTCP
Consulting Actuary
800-366-5463 ext. 2232
Xiaoyan.Song@LifeCareAssurance.com

Company and Contact

Filing Contact Information

State: Virginia **Filing Company:** Assurity Life Insurance Company
TOI/Sub-TOI: LTC Annual Rate Report/LTCINLM
Product Name: VA 2022 Assurity Annual Rate Report
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Loga Crossette-Thambiah, Regulatory Compliance Analyst 2 - Legislation
 P.O. Box 4243
 Woodland Hills, CA 91365-4243

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 818-867-2323 [Phone]
 818-867-6423 [FAX]

Filing Company Information

(This filing was made by a third party - LCA01)

Assurity Life Insurance Company	CoCode: 71439	State of Domicile: Nebraska
Long Term Care Administrative Office	Group Code:	Company Type:
P.O. Box 4243	Group Name: Assurity Security	State ID Number:
Woodland Hills, CA 91365-4243	Grp	
(818) 867-2450 ext. [Phone]	FEIN Number: 38-1843471	

State: Virginia

Filing Company: Assurity Life Insurance Company

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Filing Fees

State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

SERFF Tracking #:

LFCR-133399593

State Tracking #:

LFCR-133399593

Company Tracking #:

VA 2022 LTCINLM AL2100

State:

Virginia

Filing Company:

Assurity Life Insurance Company

TOI/Sub-TOI:

LTC Annual Rate Report/LTCINLM

Product Name:

VA 2022 Assurity Annual Rate Report

Project Name/Number:

/

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed	Colleen Moore	11/28/2022	11/28/2022

SERFF Tracking #:

LFCR-133399593

State Tracking #:

LFCR-133399593

Company Tracking #:

VA 2022 LTCINLM AL2100

State: Virginia

Filing Company: Assurity Life Insurance Company

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

Product Name: VA 2022 Assurity Annual Rate Report

Project Name/Number: /

Disposition

Disposition Date: 11/28/2022

Effective 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):
Assurity Life Insurance Company	0.000%	0.000%	\$0	11	\$22,796	0.000%	0.000%

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate	LTCINLM	Filed	Yes
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	TPA Authorization Letter	Received & Acknowledged	Yes

State: Virginia **Filing Company:** Assurity Life Insurance Company
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Rate Information

Rate data applies to filing.

Filing Method: SERFF
Rate Change Type: Neutral
Overall Percentage of Last Rate Revision: 0.000%
Effective Date of Last Rate Revision: 01/25/2021
Filing Method of Last Filing: SERFF
SERFF Tracking Number of Last Filing: LFCR-132948454

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):
Assurity Life Insurance Company	0.000%	0.000%	\$0	11	\$22,796	0.000%	0.000%

SERFF Tracking #:

LFCR-133399593

State Tracking #:

LFCR-133399593

Company Tracking #:

VA 2022 LTCINLM AL2100

State: Virginia

Filing Company:

Assurity Life Insurance Company

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

Product Name: VA 2022 Assurity Annual Rate Report

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Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		LTCINLM	AL2100P-VA, AL2100R-ROP, AL2100R-SBN-VA, AL2100R-CBI, AL2100R-SBI, AL2100R-IND-VA, AL2100R-F-IND-VA, AL2100R-MTH, AL2100R-ROB, AL2100R-WOP-VA, AL2100R-FDC, AL2100R-SBA, AL2100R-OPS	Other	Previous State Filing Number: LFCR-132948454 Rate Action Other Explanation: Annual Rate Certification filing	LTCINLM.pdf,

**Annual Rate Report for Long-Term Care Insurance [Policy/Policies]
Issued On or After October 1, 2003 that [is/are] No Longer Marketed
[14 VAC 5-200-125 A 1 a. \(2\)](#)
Reporting Period **1/1/2021 – 12/31/2021****

Company Name Assurity Life Insurance Company

Company NAIC Number 71439

Form Number(s) Forms: AL2100P-VA, AL2100R-ROP, AL2100R-SBN-VA, AL2100R-CBI,
AL2100R-SBI, AL2100R-IND-VA, AL2100R-F-IND-VA, AL2100R-MTH,
AL2100R-ROB, AL2100R-WOP-VA, AL2100R-FDC, AL2100R-SBA, AL2100R-
OPS

Issue Date(s) 10/28/2009 – 5/13/2011

SERFF Filing Number LFCR-133399593

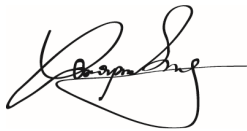
Prior SERFF Filing Number(s) LFCR-132948454

I, Xiaoyan Song, 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 is not sufficient to cover anticipated costs under best estimate assumptions and the premium rate schedule may not be reasonably expected to be sustainable over the life of the policy with no future premium increases anticipated. Based on my review of recent experience of the policy involved, in my opinion, a rate action is necessary as a result of this analysis.

We are now preparing a rate increase filing for this block and plan to submit it in the first quarter of 2023.

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.



Xiaoyan Song, FSA, MAAA, FLMI, LTCP
Post Office Box 4243
(818) 867-2232
September 14, 2021

Note:

If margins are sufficient but not equal to or greater than those originally filed, the actuary should amend this statement accordingly, describing the basis for the revised margin levels.

SERFF Tracking #:

LFCR-133399593

State Tracking #:

LFCR-133399593

Company Tracking #:

VA 2022 LTCINLM AL2100

State:

Virginia

Filing Company:

Assurity Life Insurance Company

TOI/Sub-TOI:

LTC Annual Rate Report/LTCINLM

Product Name:

VA 2022 Assurity Annual Rate Report

Project Name/Number:

/

Supporting Document Schedules

Satisfied - Item:	Actuarial Memorandum
Comments:	
Attachment(s):	Assurity VA ARC Actuarial Memo VA 2021 w Attach.pdf
Item Status:	Received & Acknowledged
Status Date:	11/28/2022

Bypassed - Item:	Product Checklist
Bypass Reason:	N/A
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	11/28/2022

Satisfied - Item:	LTC Annual Report Instructions
Comments:	See report submitted in Rate/Rule Schedule
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	11/28/2022

Satisfied - Item:	TPA Authorization Letter
Comments:	
Attachment(s):	Assurity LifeCare 2022 Authorization.pdf
Item Status:	Received & Acknowledged
Status Date:	11/28/2022

Assurity Life Insurance Company

**Home Office: Lincoln, Nebraska
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Administrative Office: Post Office Box 4243
Woodland Hills, California 91365-4243**

Actuarial Memorandum

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Long Term Care Insurance Policy:	Form AL2100P-VA
Full Return of Premium Rider:	Form AL2100R-ROP
Shortened Benefit Period Nonforfeiture Rider:	Form AL2100R-SBN-VA
Compound Benefit Increase Rider:	Form AL2100R-CBI
Simple Benefit Increase Rider:	Form AL2100R-SBI
Facility Care and Home and Community Based Care Indemnity Benefit Rider:	Form AL2100R-IND-VA
Facility Care Only Indemnity Benefit Rider:	Form AL2100R-F-IND-VA
Monthly Home and Community Based Care Benefit Rider:	Form AL2100R-MTH
Restoration of Benefits Rider:	Form AL2100R-ROB
Home and Community Based Care Waiver of Premium Benefit Rider:	Form AL2100R-WOP-VA
First Day Home and Community Based Care Benefit Rider:	Form AL2100R-FDC
Shared Benefit Amount Rider:	Form AL2100R-SBA
Optional Policy Surrender Rider:	Form AL2100R-OPS

These form and riders were issued in Virginia from 2009 through 2011. The above form and riders are no longer being marketed.

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Actuarial Memorandum

September 2022

1. Purpose of Filing

This actuarial memorandum has been prepared for the purpose of documenting that the rates meet the requirements in the statutes of Virginia.

2. Premiums

Premiums are unisex, level, lifetime or limited pay. Premiums vary by issue age, initial daily benefit, benefit period, elimination period, risk class, individual vs. joint coverage, and the riders selected.

Please see attachment B for policy form AL2100P-VA current premium rates and factors.

3. Description of Benefits

BASE POLICY BENEFITS PER (\$10.00) UNIT OF COVERAGE

- a. Coverage Outside the United States – Benefits are payable for Qualified Long Term Care Services received outside the United States or its territories, or Canada for up to 30 days per calendar year. Actual expenses incurred up to \$10 per day for covered services. Benefits paid are deducted from the Benefit Amount.
- b. Facility Care Benefit (FC) - Actual expenses incurred up to \$10.00 per day for FC (qualified long term care services, including skilled, intermediate and custodial care) while confined in a qualified Nursing Facility or Assisted Living Facility and maintenance or personal care performed in an Assisted Living Facility. Benefits paid are deducted from the Benefit Amount.
- c. Facility Bed Reservation Benefit - Actual FC expenses incurred up to \$10.00 per day to reserve a bed in a Nursing Facility or Assisted Living Facility during a temporary absence from the facility. Benefit is payable up to 30 days per calendar year. Benefits paid are deducted from the Benefit Amount.

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- d. HCBC - This optional benefit must be selected by the insured to be covered under the policy. Actual expenses incurred up to \$10.00 per day. Coverage is provided for Home Health Care (services performed through a home health care agency or independent home health caregiver, including care by a professional nurse, therapist, dietician or home health aide, and homemaker services) Adult Day Care, Hospice Care and Caregiver Training. The Caregiver Training benefit payable is a maximum lifetime benefit equal to three times the daily benefit selected. Benefits paid are deducted from the Benefit Amount.
- e. Respite Care - Actual expenses incurred up to \$10.00 per day for FC or HCBC (if covered) payable as short term care to relieve primary caregiver. Benefit is payable up to 30 days per calendar year. Benefits paid are deducted from the Benefit Amount.
- f. Alternative Plan of Care Benefit (APC) - Provides for qualified long term care services not specifically shown as being available under the policy for chronically ill individual, if agreed upon by the insured, licensed health care practitioner and the company, which may include equipment purchases or rentals; permanent or temporary modifications to the insured's residence (such as ramps or rails) or care services not normally covered under the HCBC. The APC amount agreed upon, divided by the daily benefit selected, equals the number of subsequent days for which additional benefits for HCBC (if selected) and FC will not be paid under the policy. The APC is not available for providing HCBC on policies providing FC benefits only.
- g. Optional Personal Care Advisor, accessible through toll-free telephone number, is available to insured to provide assistance with any questions about their coverage. No benefits are deducted from the Benefit Amount for this service.
- h. Optional Care Coordination, if after speaking with the Personal Care Advisor, the insured still requests additional care coordination, the company will arrange for a care coordinator to contact the insured. If the insured wishes, an RN will be available to assist with assessment and coordination of appropriate care and services. No benefits are deducted from the Benefit Amount for this service.
- i. Waiver of Premium is provided after confinement in a Nursing Facility or an Assisted Living Facility for a period of 90 days. Premiums already paid, but not earned will be refunded on a pro-rata basis.

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OPTIONAL BENEFIT RIDERS

- a. Full Return of Premium Rider (ROP) - Upon the insured's death (second-to-die in the case of joint coverage) while the policy is in force the total of premiums paid, with no deduction for benefits paid, will be paid to the beneficiary. Not available with Optional Policy Surrender Rider.
- b. Shortened Benefit Period Nonforfeiture Rider (SBN) - This rider provides the nonforfeiture credit as adopted by the NAIC. If the policy has been in force for at least three years and lapses due to nonpayment of premiums, coverage will continue and benefits will be payable based on the daily benefits in effect on the date of lapse. No further benefit increases will occur under any Benefit Increase Rider, if attached to the policy. The Benefit Amount becomes equal to the greater of: (a) the total of premiums paid for the policy and riders; or (b) 30 times the daily benefit in effect on the date of lapse. Any benefits paid after lapse will be deducted from this new Benefit Amount. Not available with Optional Policy Surrender Rider.
- c. Compound Benefit Increase Rider (CBI) - This rider increases the daily benefits and the remaining Benefit Amount by 5%, compounded annually. Increases are made regardless of claims status. Policy premiums may be payable on either the Standard Premium Payment or Step Rated Premium Payment Options. Step Rated Premium Payment Option is not available with the 10-pay or 20-pay premium options.
- d. Simple Benefit Increase Rider (SBI) - This rider increases the daily benefits and the Benefit Amount annually by 5% of the dollar amounts originally issued. The remaining Benefit Amount will be increased by the same proportion as the increase in daily benefits. Increases are made regardless of claims status.
- e. Facility Care and HCBC Indemnity Benefit Rider (IND) - This rider provides that all benefits covered under the policy will be payable on an indemnity basis at the full daily benefit selected, regardless of actual expenses incurred. This rider is not available with either the Monthly HCBC Benefit Rider or the Facility Care Only Indemnity Benefit Rider.
- f. Facility Care Only Indemnity Benefit Rider (F-IND) - This rider provides that all benefits payable for Facility Care under the policy will be payable on an indemnity basis at the full daily benefit selected, regardless of actual expenses incurred. This rider is not available with the Facility Care and HCBC Indemnity Benefit Rider.

Assurity Life Insurance Company

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- g. Monthly HCBC Benefit Rider (MTH) - This rider provides that benefits payable for HCBC under the policy will be payable on a monthly basis rather than a daily basis, times the actual number of days in that calendar month. Not available with the Facility Care and HCBC Indemnity Benefit Rider or the Facility Care Only Indemnity Benefit Rider. One of the benefit increase riders must also be selected.
- h. Restoration of Benefits Rider (ROB) - If the policy remains in force and claims paid during a single claim period have not exceeded the Benefit Amount and the insured is not eligible for the payment of benefits for 180 consecutive days, the Benefit Amount payable will be restored. Restoration of Benefits is subject to a maximum of twice the Benefit Amount selected. Not available with Lifetime Benefit Period nor Shared Benefit Amount Rider.
- i. HCBC Waiver of Premium Benefit Rider (WOP) - This rider waives premiums after 90 service days of HCBC. Premiums paid but not earned will be refunded on a pro-rata basis. Not available with Facility Care Only coverage.
- j. First Day HCBC Benefit Rider (FDC) - This rider allows benefits to be paid on the first day of a claim for HCBC, regardless if a 30, 90 or 180 day elimination period is selected for FC. Not available with Facility Care Only coverage.
- k. Shared Benefit Amount Rider (SBA) - This rider provides a shared third benefit pool on joint policies available to either or both insureds who have exhausted their benefit pool under the base policy. Not available with Lifetime Benefit Period nor with the Restoration of Benefits Rider.
- l. Optional Policy Surrender Rider (OPS) – This rider provides a policy surrender option after the policy has been in force for at least five years, subject to prior claim payment or current claim considerations. The surrender value will be in the form of a lump sum payment equal to 80% of the total of premium paid for the policy and any attached riders, payable upon satisfactory evidence of insurability. If satisfactory evidence of insurability is not provided, the surrender value will be offered as a lifetime monthly income benefit, payable until the earlier of the insured's death (last death in the case of joint coverage) or 80% of the total of premiums paid for the policy and any attached riders has been paid. Not available with Full Return of Premium Rider nor with the Shortened Benefit Period Nonforfeiture Rider.

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4. Marketing Method

This policy form was marketed by individual agents who primarily sell on an individual basis.

5. Underwriting Description

This policy form was fully underwritten with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interview and/or face-to-face assessment.

6. Renewability

These policies are guaranteed renewable for life.

7. Actuarial Assumptions

a. Lapse

Attachment C includes a comparison of experience and best estimate lapse rates by duration.

b. Mortality

The current best estimate mortality assumptions are based on experience from the reinsurer's entire similarly underwritten and administered block of LTC policies. Attachment D2 includes a comparison of actual deaths and expected deaths based on best estimate assumptions for the combined reinsurer's block of LTC policies.

Original Pricing: 1994 GAM

Best estimate: Attained age mortality is 100% of the 2012 IAR Mortality Table with G2 Scale mortality improvement, with duration selection factors varied by joint vs. single, shown in Attachment D1.

c. Morbidity

The current best estimate morbidity assumptions are also based on the reinsurer's combined experience.

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Studies are performed for incidence, continuance, utilization, and recovery from claim data. Incidence rates by gender, marital status, and attained age have been developed.

Continuance termination rates are derived from reinsurer data that has been credibility blended with the latest industry data. Utilization factors are then applied to the claim costs, which are as follows: 85% for COLA reimbursement policies and 100% for non-COLA reimbursement policies. No underwriting selection durational factors or morbidity improvement is assumed in the projection.

Policy design features have been taken into consideration. Benefit provisions, elimination periods, benefit periods, number of units, benefit growth, etc. have been accounted for either in the development of claim costs or projection model formulas.

Attachment E1 shows the best estimate incidence rates by gender and marital status. Attachment E2 shows the best estimate claim continuance rates. Attachment E3 shows the best estimate claim recovery rates.

Attachments E4 and E5 contain the analysis of actual to expected incidence and termination respectively, with expected based on best estimate assumptions, for the combined reinsurer block of LTC policies.

Original Pricing Claim Costs for skilled, intermediate and custodial Nursing Care Benefits are derived from The Reports of the Society of Actuaries based on the 1985 National Nursing Home Survey Utilization Data in Transactions, Society of Actuaries, 1988-89-90 Reports; and the Long Term Care Intercompany Study: 1984-1991 Experience in Transactions, Society of Actuaries, 1993-94 Reports. Claim costs factors shown in the original actuarial memorandum are applied to the inforce lives and represent the expected cost per life of incurred benefits.

Claim costs for Home and Community Based Care are decreasing percentages of Nursing Care claim costs derived from information provided by a reinsurer.

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Claim costs for the Shortened Benefit Period Nonforfeiture Rider, the Full Return of Premium Rider, and the Optional Policy Surrender Rider are developed by using mortality rates and nonforfeiture benefits appropriate at each duration.

For the Benefit Increase Riders, the foregoing claim costs are increased by 5% each duration (simple interest rider) or compounded by 5% each duration (compound interest rider) to obtain the actual claim costs by duration.

Claim costs were adjusted to accommodate the Waiver of Premium, which is treated as an increment of the daily benefit.

The original pricing joint claim costs are 150% of the individual claim costs.

The original pricing underwriting selection factors are by duration: 35%, 40%, 45%, 50%, 60%, 80%, 90%, 100% for durations 8 & later.

d. Interest

The maximum valuation interest rate for contract reserves, 4.0%, has been used for accumulating historical experience and for discounting projected future experience.

Original Pricing: 5.5%

Maximum Valuation: 4.0%

e. Expenses

Expenses have not been explicitly projected. It is assumed that the originally filed expense assumptions remain appropriate.

The above discussed current best estimate assumptions are based on the experience of the company, reinsurer and industry experience, and judgment. The best estimate assumptions reflect an estimate of the most likely outcome and do not reflect an explicit margin for conservatism.

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8. Issue Age Range

The issue ages are from 40 to 84 on an age nearest birthday basis, except for endorsed groups where the issue age range is 18 to 84.

9. Claim Liability and Reserves

Claim reserves as of December 31, 2021 have been discounted to the incurral date of each respective claim and included in historical incurred claims. Incurred but not reported reserve (IBNR) balances as of December 31, 2021 have been allocated to a calendar year of incurral and included in historic incurred claims. Paid claims have been discounted to the incurral date and included in historical incurred claims. Claim Reserves are calculated for active and pending claimants as present value of benefit payments discounted by interest and terminations. The IBNR is based on lag factors which are applied to the claim reserves and survivor payments based on the difference between the incurral date and the valuation date.

10. Trend Assumptions

As this is not medical insurance, we have not included any explicit medical cost trends in the projections.

11. Past and Future Policy Experience

Earned premiums and incurred claims for projection years 2022 through 2061 are developed from a projection model representing actual contracts in force as of December 31, 2021. The assumptions described above for morbidity, voluntary lapse and mortality are used to project life years, earned premiums and incurred claims.

Nationwide experience and projections by calendar year are shown in Attachment F.

A future annual loss ratio is calculated, with and without interest, as anticipated incurred claims divided by earned premiums. A lifetime loss ratio as of December 31, 2021 is calculated as the sum of accumulated past experience and discounted future experience where accumulation and discounting occur at 4.0%, the maximum valuation interest rate.

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12. Loss Ratio Requirement Compliance Demonstration

Historical experience and projected experience using current best estimates are shown in Attachment F, which demonstrates that the accumulated lifetime loss ratio exceeds the minimum loss ratio requirement.

13. Nationwide and Virginia Distribution of Business

The distributions of policies and premiums as of December 31, 2021 are shown in the following attachments:

Nationwide distribution: Attachment A1

Virginia distribution: Attachment A2

14. Rate Increase History

No prior rate increases were requested.

15. Credibility of Experience Data

According to Florida's insurance regulation (FAC Rule 69O-149.0025) regarding credible data, for policy forms with low expected claims frequency, a total of 1,000 claims shall be assigned 100 percent credibility; 200 claims shall be assigned 0 percent credibility. If 100 percent credibility is not achieved by using the most recent five-year period, the data from the most recent five-year period only shall be used. Long Term Care insurance falls into this category of policy forms with low expected claim frequency.

Since this block of business is 100% reinsured, the experience from the reinsurer's similarly underwritten and administered long term care products is pooled together to set the best estimate assumptions.

The reinsurer's data contains over 25,000 claims. Therefore, we believe the reinsurer's experience data used to set the best estimate assumption is fully credible on an aggregate basis. However, it may not be 100 percent credible at each individual attained age. The industry experience, SOA LTC Intercompany Experience Study 2000-2011 Report, has been blended with reinsurer's data where credibility is low for some attained ages.

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Actuarial Memorandum

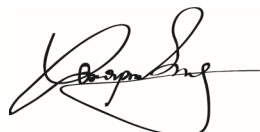
September 2022

16. Actuarial Certification

I, Xiaoyan Song, 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 is not sufficient to cover anticipated costs under current best estimate assumptions and the premium rate schedule may not be reasonably expected to be sustainable over the life of the policy with no future premium increases anticipated. Based on my review of recent experience of the policy involved, in my opinion, a rate action is necessary at this time as a result of this analysis.

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.



Xiaoyan Song, FSA, MAAA, FLMI, LTCP
Consulting Actuary

Assurity Life Insurance Company
Policy Form: AL-2100
Attachment A1
Nationwide Policy and Premium Distribution

	Policies*	Premium	% of Policies	% of Premium
Base				
Comprehensive Care	576	1,593,315	90%	92%
Facility Only	65	146,359	10%	8%
Total	641	1,739,674	100%	100%
COLA Options				
No COLA	126	236,691	20%	14%
Compound COLA 5%	345	1,021,900	54%	59%
Step-Rated Compound COLA 5%	12	36,643	2%	2%
Simple COLA 5%	158	444,440	25%	26%
Total	641	1,739,674	100%	100%
Nonforfeiture Options				
None	602	1,627,662	94%	94%
Full Return of Premium	8	28,158	1%	2%
Shortened Benefit Period	4	4,771	1%	0%
Optional Surrender	27	79,083	4%	5%
Total	641	1,739,674	100%	100%
Pay Period				
Lifetime	550	1,690,909	86%	97%
10 Pay	81	0	13%	0%
20 Pay	10	48,765	2%	3%
Total	641	1,739,674	100%	100%
Joint/Single Life				
Joint	364	1,064,656	57%	61%
Single	277	675,018	43%	39%
Total	641	1,739,674	100%	100%
Billing Mode				
Annual	344	970,194	54%	56%
Semi-Annual	26	73,612	4%	4%
Quarterly	43	116,253	7%	7%
Monthly	228	579,615	36%	33%
Total	641	1,739,674	100%	100%
Elimination Period				
0 Day	10	18,044	2%	1%
30 Days	31	92,433	5%	5%
90 Days	557	1,527,810	87%	88%
180 Days	43	101,386	7%	6%
Total	641	1,739,674	100%	100%
Benefit Period (NH/HH)				
2 Year / 2 Year	16	34,239	2%	2%
3 Year / 3 Year	69	191,090	11%	11%
4 Year / 4 Year	23	55,224	4%	3%
5 Year / 5 Year	72	190,907	11%	11%
6 Year / 6 Year	16	42,897	2%	2%
10 Year / 10 Year	18	67,133	3%	4%
Lifetime / Lifetime	427	1,158,185	67%	67%
Total	641	1,739,674	100%	100%
Issue Age Cohort				
20-29	1	711	0%	0%
30-39	7	15,855	1%	1%
40-49	43	65,570	7%	4%
50-59	265	584,125	41%	34%
60-69	295	946,586	46%	54%
70-79	28	118,856	4%	7%
80-89	2	7,970	0%	0%
Total	641	1,739,674	100%	100%

*Note: The number of policies in Exhibit A1 may differ from the number of policyholders listed on the SERFF Rate/Rule Schedule tab. This is because joint policies consist of two policyholders under a single policy.

*Note: This exhibit includes paid-up policies that no longer pay premiums (i.e. premium = 0).

Assurity Life Insurance Company
Policy Form: AL-2100
Attachment A2
Virginia Policy and Premium Distribution

	Policies*	Premium	% of Policies	% of Premium
Base				
Comprehensive Care	6	20,339	86%	89%
Facility Only	1	2,457	14%	11%
Total	7	22,796	100%	100%
COLA Options				
No COLA	3	9,395	43%	41%
Compound COLA 5%	2	4,818	29%	21%
Compound COLA 5%	0	0	0%	0%
Simple COLA 5%	2	8,583	29%	38%
Total	7	22,796	100%	100%
Nonforfeiture Options				
None	7	22,796	100%	100%
Full Return of Premium	0	0	0%	0%
Shortened Benefit Period	0	0	0%	0%
Optional Surrender	0	0	0%	0%
Total	7	22,796	100%	100%
Pay Period				
Lifetime	7	22,796	100%	100%
10 Pay	0	0	0%	0%
20 Pay	0	0	0%	0%
Total	7	22,796	100%	100%
Joint/Single Life				
Joint	4	12,405	57%	54%
Single	3	10,391	43%	46%
Total	7	22,796	100%	100%
Billing Mode				
Annual	3	8,548	43%	37%
Semi-Annual	0	0	0%	0%
Quarterly	0	0	0%	0%
Monthly	4	14,248	57%	63%
Total	7	22,796	100%	100%
Elimination Period				
0 Day	0	0	0%	0%
30 Days	0	0	0%	0%
90 Days	6	20,435	86%	90%
180 Days	1	2,360	14%	10%
Total	7	22,796	100%	100%
Benefit Period (NH/HH)				
2 Year / 2 Year	1	3,208	14%	14%
3 Year / 3 Year	1	3,699	14%	16%
4 Year / 4 Year	2	6,806	29%	30%
5 Year / 5 Year	3	9,084	43%	40%
6 Year / 6 Year	0	0	0%	0%
10 Year / 10 Year	0	0	0%	0%
Lifetime / Lifetime	0	0	0%	0%
Total	7	22,796	100%	100%
Issue Age Cohort				
20-29	0	0	0%	0%
30-39	0	0	0%	0%
40-49	0	0	0%	0%
50-59	2	4,849	29%	21%
60-69	3	10,013	43%	44%
70-79	2	7,933	29%	35%
80-89	0	0	0%	0%
Total	7	22,796	100%	100%

*Note: The number of policies in Exhibit A2 may differ from the number of policyholders listed on the SERFF Rate/Rule Schedule tab. This is because joint policies consist of two policyholders under a single policy.

*Note: This exhibit includes paid-up policies that no longer pay premiums (i.e. premium = 0).

Assurity Life Insurance Company
 Policy Form: AL-2100-VA
 Attachment B
 Rates and Factors
 Individual / Select Risk / Lifetime Benefit Period / 90 Day Elimination Period

Issue Age	ANNUAL RATES Standard Risk Class PER \$10 DAILY BENEFIT		Benefit Increase Factors							Other Riders Factors						
	Facility Care	Comprehensive Care	Lifetime Pay			Limited Pay				Limited Pay						
			All Years	5% Compound Step Rate		5% Simple	5% Compound	5% Simple	All Years	All Years	All Years	10 Year	20 Year	ROP	SBP	HCBC Waiver
				1st Year	Annual Increase *											
18	51.50	64.38	8.750	1.330	0.510	6.300	9.500	8.430	4.030	2.400	1.600	1.030	1.010			
19	52.63	65.75	8.340	1.330	0.483	6.000	9.090	7.980	3.980	2.370	1.610	1.035	1.011			
20	53.75	67.25	7.940	1.330	0.457	5.720	8.700	7.560	3.920	2.350	1.615	1.040	1.013			
21	54.88	68.63	7.580	1.330	0.434	5.460	8.340	7.180	3.870	2.320	1.620	1.045	1.015			
22	56.00	70.00	7.240	1.330	0.412	5.210	8.000	6.820	3.820	2.300	1.630	1.050	1.016			
23	57.00	71.25	6.920	1.330	0.392	4.980	7.680	6.480	3.770	2.270	1.640	1.060	1.018			
24	58.00	72.50	6.620	1.330	0.372	4.770	7.390	6.170	3.720	2.250	1.650	1.070	1.020			
25	59.00	73.75	6.340	1.330	0.354	4.570	7.110	5.880	3.670	2.230	1.660	1.075	1.022			
26	59.88	74.88	6.080	1.330	0.337	4.380	6.850	5.600	3.620	2.200	1.670	1.080	1.023			
27	60.75	76.00	5.840	1.330	0.322	4.200	6.600	5.350	3.570	2.180	1.680	1.090	1.025			
28	61.63	77.00	5.610	1.330	0.307	4.040	6.370	5.110	3.520	2.160	1.690	1.095	1.027			
29	62.38	78.00	5.390	1.330	0.293	3.880	6.160	4.890	3.480	2.130	1.695	1.100	1.029			
30	63.13	78.88	5.190	1.330	0.280	3.740	5.950	4.680	3.430	2.110	1.700	1.115	1.031			
31	63.75	79.75	5.000	1.330	0.268	3.600	5.760	4.490	3.390	2.090	1.710	1.120	1.033			
32	64.37	80.50	4.830	1.330	0.257	3.470	5.580	4.300	3.340	2.070	1.720	1.130	1.035			
33	64.88	81.13	4.660	1.330	0.246	3.360	5.420	4.130	3.300	2.050	1.730	1.140	1.036			
34	65.38	81.75	4.500	1.330	0.235	3.240	5.260	3.970	3.250	2.020	1.740	1.145	1.038			
35	65.88	82.38	4.360	1.330	0.226	3.140	5.110	3.820	3.210	2.000	1.750	1.150	1.040			
36	66.25	82.88	4.220	1.330	0.217	3.040	4.970	3.680	3.170	1.980	1.760	1.160	1.042			
37	66.50	83.13	4.090	1.330	0.209	2.950	4.840	3.550	3.120	1.960	1.770	1.170	1.044			
38	66.75	83.50	3.970	1.330	0.201	2.860	4.720	3.430	3.080	1.940	1.780	1.180	1.046			
39	66.88	83.63	3.860	1.330	0.194	2.780	4.610	3.310	3.040	1.920	1.790	1.190	1.048			
40	67.00	83.75	3.750	1.330	0.187	2.700	4.500	3.200	3.000	1.900	1.800	1.200	1.050			
41	68.00	85.00	3.650	1.330	0.180	2.630	4.400	3.100	2.960	1.880	1.810	1.210	1.052			
42	69.00	86.25	3.550	1.330	0.174	2.560	4.300	3.000	2.920	1.860	1.820	1.220	1.054			
43	70.00	87.50	3.450	1.330	0.167	2.490	4.200	2.900	2.880	1.840	1.830	1.230	1.056			
44	71.00	88.75	3.350	1.330	0.161	2.420	4.100	2.800	2.840	1.820	1.840	1.240	1.058			
45	72.00	90.00	3.250	1.330	0.154	2.350	4.000	2.700	2.800	1.800	1.850	1.250	1.060			
46	73.00	91.25	3.150	1.330	0.148	2.280	3.900	2.600	2.760	1.780	1.870	1.260	1.062			
47	74.00	92.50	3.050	1.330	0.142	2.210	3.800	2.500	2.720	1.760	1.890	1.270	1.064			
48	75.00	93.75	2.950	1.330	0.135	2.140	3.700	2.400	2.680	1.740	1.910	1.280	1.066			
49	76.00	95.00	2.850	1.330	0.129	2.070	3.600	2.300	2.640	1.720	1.930	1.290	1.068			
50	77.00	96.25	2.750	1.330	0.122	2.000	3.500	2.200	2.600	1.700	1.950	1.300	1.070			
51	80.00	100.00	2.700	1.330	0.119	1.960	3.400	2.150	2.560	1.680	1.970	1.310	1.072			
52	83.00	103.75	2.650	1.330	0.116	1.920	3.300	2.100	2.520	1.660	1.990	1.320	1.074			
53	87.00	108.75	2.570	1.330	0.111	1.880	3.200	2.050	2.480	1.640	2.010	1.330	1.076			
54	90.00	112.50	2.470	1.330	0.104	1.840	3.100	2.000	2.440	1.620	2.030	1.340	1.078			
55	93.00	116.25	2.360	1.330	0.097	1.800	3.000	1.950	2.400	1.600	2.050	1.350	1.080			
56	100.00	125.00	2.310	1.330	0.094	1.770	2.900	1.930	2.360	1.580	2.070	1.360	1.082			
57	107.00	133.75	2.260	1.330	0.091	1.740	2.800	1.900	2.320	1.560	2.090	1.370	1.084			
58	114.00	142.50	2.210	1.330	0.087	1.710	2.700	1.870	2.280	1.540	2.110	1.380	1.086			
59	122.00	152.50	2.150	1.330	0.083	1.680	2.600	1.840	2.240	1.520	2.130	1.390	1.088			
60	129.00	161.25	2.100	1.330	0.080	1.650	2.500	1.810	2.200	1.500	2.150	1.400	1.090			
61	138.00	172.50	2.060	1.330	0.078	1.620	2.450	1.780	2.160	1.480	2.170	1.410	1.092			
62	147.00	183.75	2.020	1.330	0.075	1.590	2.400	1.750	2.120	1.460	2.190	1.420	1.094			
63	157.00	196.25	1.970	1.330	0.072	1.560	2.350	1.720	2.080	1.440	2.210	1.430	1.096			
64	166.00	207.50	1.930	1.330	0.069	1.530	2.300	1.690	2.040	1.420	2.230	1.440	1.098			
65	175.00	218.75	1.890	1.330	0.067	1.500	2.250	1.670	2.000	1.400	2.250	1.450	1.100			
66	192.00	240.00	1.850	1.330	0.064	1.480	2.200	1.650	1.950	1.390	2.280	1.460	1.102			
67	208.00	260.00	1.810	1.330	0.061	1.460	2.150	1.630	1.900	1.380	2.310	1.470	1.104			
68	225.00	281.25	1.760	1.330	0.058	1.440	2.100	1.610	1.850	1.370	2.340	1.480	1.106			
69	241.00	301.25	1.720	1.330	0.056	1.420	2.050	1.590	1.800	1.360	2.370	1.490	1.108			
70	258.00	322.50	1.680	1.330	0.053	1.400	2.000	1.570	1.750	1.350	2.400	1.500	1.110			
71	309.00	386.25	1.660	1.330	0.052	1.390	1.960	1.550	1.700	1.340	2.430	1.510	1.112			
72	361.00	451.25	1.640	1.330	0.051	1.380	1.920	1.540	1.650	1.330	2.460	1.520	1.114			
73	412.00	515.00	1.620	1.330	0.049	1.370	1.880	1.530	1.600	1.320	2.490	1.530	1.116			
74	464.00	580.00	1.600	1.330	0.048	1.360	1.840	1.520	1.550	1.310	2.520	1.540	1.118			
75	515.00	643.75	1.580	1.330	0.047	1.350	1.800	1.510	1.500	1.300	2.550	1.550	1.120			
76	567.00	708.75	1.560	1.330	0.045	1.340	1.770	1.500	1.480	1.290	2.580	1.560	1.122			
77	618.00	772.50	1.550	1.330	0.045	1.330	1.740	1.490	1.460	1.280	2.610	1.570	1.124			
78	670.00	837.50	1.540	1.330	0.044	1.320	1.710	1.480	1.440	1.270	2.640	1.580	1.126			
79	721.00	901.25	1.520	1.330	0.043	1.310	1.680	1.470	1.420	1.260	2.670	1.590	1.128			
80	773.00	966.25	1.500	1.330	0.041	1.300	1.650	1.450	1.400	1.250	2.700	1.600	1.130			
81	824.00	1,030.00	1.490	1.330	0.041	1.290	1.630	1.430	1.380	1.240	2.730	1.610	1.132			
82	876.00	1,095.00	1.480	1.330	0.040	1.280	1.610	1.410	1.360	1.230	2.760	1.620	1.134			
83	927.00	1,158.75	1.470	1.330	0.040	1.270	1.590	1.390	1.340	1.220	2.790	1.630	1.136			
84	979.00	1,223.75	1.460	1.330	0.039	1.260	1.570	1.370	1.320	1.210	2.820	1.640	1.138			

Issue Age Independent Factors							
Joint Policy	1.20	Risk Classes	Preferred 0.60	Payment Mode	Annual 1.000	Elimination Period	0-Day 1.40
Facility Only Indemnity	1.05	Select	0.80	Semi-Annual	0.520	30-Day	1.20
Comprehensive Indemnity	1.20	Standard	1.00	Quarterly	0.270	90-Day	1.00
Monthly HCBC	1.10	Substandard*	1.60	Monthly	0.090	180-Day	0.90
Optional Policy Surrender	1.10	Substandard*	2.40			180-Day	1.20
Employer/Association Group Discount	5% for all ages	Benefit Period	10-Year 0.95	Restoration of Benefits	10-Year 1.011	Shared Benefit Amount	10-Year 1.02
			6-Year 0.88		6-Year 1.034		6-Year 1.08
			5-Year 0.85		5-Year 1.047		5-Year 1.11
			4-Year 0.78		4-Year 1.051		4-Year 1.15
			3-Year 0.63		3-Year 1.063		3-Year 1.21
			2-Year 0.55		2-Year 1.075		2-Year 1.29

* 5% Compound Step Rate COLA Annual Increase: the factor for any policy year is calculated by adding the annual increase to the previous year factor.

**Assurity Life Insurance Company
 Combined Reinsurer Experience
 Attachment C
 Lapse Rates**

Duration*	Exposure**	Lapses	Actual Lapse Rates	Best Estimate Lapse Rates	A/E
10	155,154	968	0.62%	0.50%	1.25
11	145,396	917	0.63%	0.50%	1.26
12	137,407	875	0.64%	0.50%	1.27
13	130,004	763	0.59%	0.50%	1.17
14	122,488	613	0.50%	0.50%	1.00
15	114,351	543	0.47%	0.50%	0.95
16	105,969	473	0.45%	0.50%	0.89
17	92,583	372	0.40%	0.50%	0.80
18	76,560	384	0.50%	0.50%	1.00
19	59,629	301	0.50%	0.50%	1.01
20	43,565	218	0.50%	0.50%	1.00
21	33,028	170	0.51%	0.50%	1.03
22	25,772	123	0.48%	0.50%	0.95
23	17,433	112	0.64%	0.50%	1.28
24	10,971	69	0.63%	0.50%	1.26
25	6,248	41	0.66%	0.50%	1.31
26	3,099	17	0.55%	0.50%	1.10
27	1,355	10	0.74%	0.50%	1.48
28	523	1	0.19%	0.50%	0.38
29	261	1	0.38%	0.50%	0.77
30	92	1	1.09%	0.50%	2.17
31	28	0	0.00%	0.50%	0.00
Average	1,281,917	6,972	0.54%	0.50%	1.09

* All Assurity policies are duration 10+

** Lifetime-pay & 20-pay policies only

Assurity Life Insurance Company
Policy Form: AL-2100
Attachment D1
Mortality Selection Factors

Policy Duration	Selection Factors	
	Single	Joint
1	0.200	0.200
2	0.370	0.310
3	0.470	0.390
4	0.500	0.410
5	0.530	0.430
6	0.550	0.480
7	0.590	0.500
8	0.620	0.520
9	0.670	0.540
10	0.740	0.560
11	0.790	0.580
12	0.820	0.640
13	0.870	0.670
14	0.920	0.710
15	1.000	0.730
16	1.000	0.760
17	1.000	0.810
18	1.000	0.910
19	1.000	1.000
20+	1.000	1.000

**Assurity Life Insurance Company
 Combined Reinsurer Experience
 Attachment D2
 Mortality A to E Analysis**

Attained Age	Single Lives Death Counts			Joint Lives Death Counts**			Total Death Counts		
	Actual	Expected*	A/E	Actual	Expected*	A/E	Actual	Expected*	A/E
<40	1	1	69%	1	3	37%	2	4	48%
40-44	2	4	55%	14	10	135%	16	14	114%
45-49	25	14	175%	52	40	128%	77	55	141%
50-54	63	58	109%	148	158	94%	211	215	98%
55-59	162	184	88%	443	481	92%	605	666	91%
60-64	375	486	77%	1,014	1,162	87%	1,389	1,648	84%
65-69	711	867	82%	1,537	1,868	82%	2,248	2,735	82%
70-74	1,033	1,133	91%	2,155	2,205	98%	3,188	3,338	96%
75-79	1,255	1,202	104%	2,224	2,004	111%	3,479	3,206	109%
80-84	1,275	1,096	116%	1,625	1,333	122%	2,900	2,429	119%
85-89	926	811	114%	806	595	135%	1,732	1,407	123%
90+	576	468	123%	231	170	136%	807	638	126%
Total	6,404	6,325	101%	10,250	10,030	102%	16,654	16,355	102%

* Expected - 100% of 2012 IAR mortality table with the mortality selection factors shown in Exhibit D2

** Joint lives - joint policy at issue

Assurity Life Insurance Company
Policy Form: AL-2100
Attachment E1
Incidence Rates Per 100

Best Estimate						
Attained Age	Nursing Facility Care Incidence Rates				Incidence Rate Factors	
	Single Male	Single Female	Married Male	Married Female	Home and Community Based Care and Assisted Living Facility	Assisted Living Facility
40	0.0016	0.0015	0.0004	0.0003	1.550	0.300
41	0.0019	0.0017	0.0005	0.0004	1.550	0.300
42	0.0023	0.0020	0.0006	0.0005	1.550	0.300
43	0.0027	0.0024	0.0008	0.0006	1.550	0.300
44	0.0031	0.0029	0.0009	0.0007	1.550	0.300
45	0.0037	0.0034	0.0011	0.0009	1.550	0.300
46	0.0043	0.0040	0.0013	0.0011	1.550	0.300
47	0.0050	0.0048	0.0016	0.0013	1.550	0.300
48	0.0059	0.0056	0.0019	0.0016	1.550	0.300
49	0.0069	0.0067	0.0023	0.0020	1.550	0.300
50	0.0081	0.0079	0.0028	0.0024	1.550	0.300
51	0.0096	0.0094	0.0034	0.0029	1.550	0.300
52	0.0112	0.0111	0.0041	0.0036	1.550	0.300
53	0.0132	0.0132	0.0049	0.0043	1.550	0.300
54	0.0155	0.0156	0.0059	0.0053	1.550	0.300
55	0.0181	0.0185	0.0071	0.0064	1.550	0.300
56	0.0214	0.0220	0.0086	0.0079	1.550	0.300
57	0.0251	0.0261	0.0104	0.0096	1.550	0.300
58	0.0310	0.0324	0.0132	0.0123	1.436	0.290
59	0.0384	0.0406	0.0169	0.0159	1.311	0.290
60	0.0474	0.0505	0.0214	0.0203	1.206	0.280
61	0.0582	0.0627	0.0270	0.0259	1.111	0.270
62	0.0707	0.0768	0.0337	0.0327	1.045	0.270
63	0.0852	0.0934	0.0417	0.0409	0.969	0.260
64	0.1039	0.1149	0.0523	0.0517	0.872	0.260
65	0.1255	0.1401	0.0650	0.0649	0.795	0.250
66	0.1511	0.1702	0.0804	0.0812	0.728	0.240
67	0.1810	0.2058	0.0990	0.1010	0.671	0.240
68	0.2161	0.2480	0.1214	0.1251	0.613	0.230
69	0.2582	0.2990	0.1491	0.1552	0.555	0.230
70	0.3068	0.3585	0.1821	0.1915	0.507	0.220
71	0.3620	0.4269	0.2209	0.2346	0.470	0.220
72	0.4217	0.5019	0.2644	0.2837	0.452	0.210
73	0.4986	0.5988	0.3213	0.3483	0.425	0.210
74	0.5900	0.7150	0.3908	0.4279	0.397	0.200
75	0.6983	0.8541	0.4755	0.5259	0.369	0.200
76	0.8268	1.0205	0.5786	0.6465	0.341	0.190
77	0.9718	1.2105	0.6990	0.7890	0.323	0.190
78	1.1475	1.4426	0.8484	0.9674	0.305	0.190
79	1.3448	1.7061	1.0220	1.1771	0.297	0.180
80	1.5883	2.0334	1.2406	1.4434	0.279	0.180
81	1.8761	2.4239	1.5062	1.7703	0.261	0.170
82	2.1987	2.8668	1.8143	2.1541	0.253	0.170
83	2.6767	3.3665	2.2410	2.7070	0.235	0.170
84	3.1916	3.9559	2.7468	3.3211	0.227	0.160
85	3.7395	4.6271	3.3229	3.9827	0.219	0.160
86	4.2889	5.3353	3.9344	4.6458	0.212	0.150
87	4.8111	6.0364	4.5450	5.2599	0.204	0.150
88	5.2326	6.6271	5.0715	5.7174	0.196	0.150
89	5.5194	7.0495	5.4617	5.9417	0.188	0.140
90	5.9225	7.7277	5.9683	6.4251	0.180	0.140
91	6.2515	8.3074	6.3991	6.8276	0.182	0.140
92	6.6943	9.0377	6.9459	7.3542	0.174	0.130
93	7.1432	9.0997	7.5003	7.8880	0.166	0.130
94	7.5268	9.0764	7.4810	7.8677	0.169	0.130
95	7.5140	9.0609	7.4683	7.8543	0.171	0.130
96	7.5657	9.1232	7.5196	7.9083	0.163	0.120
97	7.5462	9.0997	7.5003	7.8880	0.166	0.120
98	7.5333	9.0841	7.4874	7.8745	0.168	0.120
99	7.5140	9.0609	7.4683	7.8543	0.171	0.110
100	7.4948	9.0377	7.4492	7.8342	0.174	0.110
101	7.4820	9.0224	7.4365	7.8209	0.176	0.110
102	7.4630	8.9994	7.4176	7.8010	0.179	0.110
103	7.4503	8.9842	7.4050	7.7878	0.181	0.100
104	7.4315	8.9614	7.3863	7.7680	0.184	0.100
105	7.4127	8.9387	7.3676	7.7484	0.187	0.100
106	7.4002	8.9237	7.3552	7.7354	0.189	0.100
107	7.3816	8.9012	7.3367	7.7159	0.192	0.100
108	7.3631	8.8789	7.3183	7.6965	0.195	0.100
109	7.3508	8.8641	7.3060	7.6837	0.197	0.100
110	7.3324	8.8419	7.2878	7.6645	0.200	0.100

Assurity Life Insurance Company
Policy Form: AL-2100
Exhibit E2
Claim Continuance*

Claim Continuance - Male								
Claim Months Attained Age	52	62	67	72	77	82	87	92
0	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
12	0.2682	0.2512	0.3530	0.3889	0.4357	0.4826	0.4841	0.4709
24	0.1973	0.1954	0.2638	0.2845	0.3098	0.3307	0.3157	0.2780
36	0.1645	0.1614	0.2027	0.2098	0.2189	0.2198	0.1963	0.1473
48	0.1360	0.1371	0.1618	0.1495	0.1481	0.1422	0.1117	0.0732
60	0.1227	0.1163	0.1240	0.1082	0.0993	0.0860	0.0596	0.0332
72	0.0979	0.0954	0.0975	0.0779	0.0657	0.0519	0.0357	0.0213
84	0.0771	0.0859	0.0717	0.0526	0.0434	0.0328	0.0196	0.0040
96	0.0743	0.0750	0.0560	0.0380	0.0279	0.0213	0.0132	0.0039
108	0.0712	0.0632	0.0499	0.0314	0.0173	0.0152	0.0044	0.0039
120	0.0707	0.0576	0.0384	0.0204	0.0124	0.0101	0.0011	0.0034
132	0.0596	0.0513	0.0307	0.0132	0.0063	0.0052	0.0011	0.0024
144	0.0471	0.0343	0.0208	0.0070	0.0040	0.0019	0.0009	0.0016
156	0.0468	0.0267	0.0141	0.0037	0.0024	0.0008	0.0004	0.0010
168	0.0468	0.0267	0.0134	0.0033	0.0003	0.0005	0.0002	0.0006
180	0.0467	0.0266	0.0054	0.0022	0.0002	0.0003	0.0001	0.0004
300	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Claim Continuance - Female								
Claim Months Attained Age	52	62	67	72	77	82	87	92
0	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
12	0.2873	0.2477	0.3480	0.4583	0.5157	0.5779	0.6189	0.5840
24	0.2168	0.1867	0.2702	0.3674	0.4197	0.4627	0.4785	0.4197
36	0.1750	0.1519	0.2242	0.2973	0.3374	0.3579	0.3460	0.2576
48	0.1490	0.1258	0.1852	0.2380	0.2631	0.2683	0.2408	0.1670
60	0.1354	0.1014	0.1505	0.1883	0.1986	0.1920	0.1566	0.0945
72	0.1185	0.0897	0.1261	0.1505	0.1526	0.1363	0.1038	0.0583
84	0.1038	0.0730	0.1052	0.1186	0.1168	0.0991	0.0682	0.0320
96	0.0965	0.0672	0.0845	0.0926	0.0874	0.0698	0.0439	0.0158
108	0.0893	0.0598	0.0675	0.0716	0.0610	0.0501	0.0324	0.0104
120	0.0794	0.0492	0.0489	0.0539	0.0422	0.0353	0.0206	0.0044
132	0.0734	0.0391	0.0422	0.0426	0.0324	0.0233	0.0156	0.0023
144	0.0693	0.0311	0.0314	0.0363	0.0215	0.0149	0.0065	0.0001
156	0.0636	0.0105	0.0279	0.0228	0.0122	0.0085	0.0002	0.0001
168	0.0549	0.0075	0.0217	0.0132	0.0082	0.0069	0.0002	0.0000
180	0.0418	0.0075	0.0132	0.0056	0.0069	0.0046	0.0002	0.0000
300	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

*claim continuance reflects total terminations from both death and recovery.

Assurity Life Insurance Company
Policy Form: AL-2100
Exhibit F3
Claim Recovery

Attained Age	Recovery Rates*
40	36.76%
45	29.22%
50	23.23%
55	18.47%
60	14.68%
65	11.67%
70	9.28%
75	7.38%
80	5.86%
85	4.66%
90	3.71%
95	2.95%
100	2.34%
105	1.86%
110	1.48%
115	1.18%
120+	0.00%

* Claim recovery is based on Lifetime Benefit Period policies.
The claim recovery rates are developed using a linear regression method.

**Assurity Life Insurance Company
 Combined Reinsurer Experience
 Exhibit E4
 Incidence A to E Analysis**

Attained Age	Single Male				Single Female			
	Exposure	Claim Count	Expected Claim Count	A/E	Exposure	Claim Count	Expected Claim Count	A/E
40-44	1,373	0	0	0%	1,700	0	0	0%
45-49	4,192	6	1	649%	6,477	9	2	598%
50-54	9,858	7	5	153%	18,707	24	9	255%
55-59	21,305	36	21	173%	45,893	71	50	143%
60-64	35,804	77	73	106%	85,058	218	197	110%
65-69	46,764	192	199	97%	116,663	584	579	101%
70-74	45,076	407	397	102%	117,133	1,233	1,241	99%
75-79	31,647	594	583	102%	87,505	2,011	1,995	101%
80-84	17,359	689	668	103%	52,140	2,573	2,535	101%
85-89	6,686	498	500	100%	22,845	2,094	2,148	97%
90+	1,752	206	198	104%	7,020	1,003	980	102%
Total	221,815	2,712	2,645	103%	561,141	9,820	9,737	101%

Attained Age	Married Male				Married Female			
	Exposure	Claim Count	Expected Claim Count	A/E	Exposure	Claim Count	Expected Claim Count	A/E
40-44	4,401	1	0	774%	7,848	6	0	2900%
45-49	14,952	5	1	473%	23,905	18	2	1148%
50-54	39,623	24	7	355%	58,441	49	10	512%
55-59	94,706	87	39	224%	125,352	127	51	249%
60-64	175,639	249	172	145%	206,425	311	207	150%
65-69	235,068	559	546	102%	240,263	600	591	102%
70-74	219,787	1,151	1,207	95%	200,665	1,157	1,210	96%
75-79	144,383	1,960	1,890	104%	122,637	1,828	1,829	100%
80-84	69,695	2,188	2,199	99%	56,809	2,139	2,072	103%
85-89	23,060	1,653	1,694	98%	17,578	1,369	1,400	98%
90+	2,166	279	248	113%	3,176	403	393	103%
Total	1,023,481	8,156	8,002	102%	1,063,099	8,007	7,765	103%

**Assurity Life Insurance Company
 Combined Reinsurer Experience
 Exhibit E5
 Claim Termination A to E Analysis**

Duration	Claim Exposure	Actual	Expected	A/E
1st quarter	2,116	552	676	82%
2nd quarter	5,215	806	720	112%
3rd quarter	4,439	397	421	94%
4th quarter	3,939	306	314	98%
2	13,877	3,288	3,458	95%
3	9,583	2,310	2,561	90%
4	6,542	2,058	1,955	105%
5	3,993	1,068	1,202	89%
6	2,605	632	740	85%
7	1,742	405	507	80%
8	1,179	274	321	85%
9	792	179	200	90%
10	540	125	159	79%
11	365	87	99	88%
12	245	65	88	74%
13	153	26	57	46%
14	101	54	27	200%
15	68	34	24	142%
16	48	22	9	232%
17	34	16	6	290%
18	22	11	2	516%
19	13	6	3	204%
20	9	4	2	198%
21	6	3	1	224%
22	3	2	1	399%
23	2	2	1	400%
24	1	1	1	200%
25	1	1	1	200%
Average	57,626	12,728	13,553	94%

**Assurity Life Insurance Company
 Nationwide Experience Projection
 Policy Form: AL-2100**

Attachment F

	Calendar Year				at:	4.00%
		Earned Premium	Incurred Claims*	Loss Ratio	Year End 2020	Disc/Accum Factor
Historical Experience	2007	68,440	0	0.0%	14.5	1.7660
	2008	746,042	0	0.0%	13.5	1.6980
	2009	1,351,495	0	0.0%	12.5	1.6327
	2010	2,331,471	0	0.0%	11.5	1.5699
	2011	3,170,680	0	0.0%	10.5	1.5096
	2012	3,090,183	1,705	0.1%	9.5	1.4515
	2013	2,890,783	0	0.0%	8.5	1.3957
	2014	2,829,016	7,724	0.3%	7.5	1.3420
	2015	2,772,639	0	0.0%	6.5	1.2904
	2016	2,776,166	223,216	8.0%	5.5	1.2407
	2017	2,716,891	0	0.0%	4.5	1.1930
	2018	2,468,904	358,266	14.5%	3.5	1.1471
	2019	2,397,694	54,427	2.3%	2.5	1.1030
2020	1,991,988	544,483	27.3%	1.5	1.0606	
2021	1,795,899	317,127	17.7%	0.5	1.0198	
Projected Future Experience	2022	1,758,548	719,835	40.9%	-0.5	0.9806
	2023	1,704,734	847,510	49.7%	-1.5	0.9429
	2024	1,648,606	990,834	60.1%	-2.5	0.9066
	2025	1,590,065	1,151,099	72.4%	-3.5	0.8717
	2026	1,529,103	1,328,439	86.9%	-4.5	0.8382
	2027	1,459,884	1,523,270	104.3%	-5.5	0.8060
	2028	1,387,401	1,734,289	125.0%	-6.5	0.7750
	2029	1,304,877	1,955,681	149.9%	-7.5	0.7452
	2030	1,229,328	2,186,555	177.9%	-8.5	0.7165
	2031	1,150,421	2,424,039	210.7%	-9.5	0.6889
	2032	1,078,767	2,662,680	246.8%	-10.5	0.6624
	2033	1,007,143	2,897,405	287.7%	-11.5	0.6370
	2034	935,492	3,122,182	333.7%	-12.5	0.6125
	2035	864,460	3,332,655	385.5%	-13.5	0.5889
	2036	794,560	3,519,324	442.9%	-14.5	0.5663
	2037	726,369	3,679,540	506.6%	-15.5	0.5445
	2038	660,358	3,805,701	576.3%	-16.5	0.5235
	2039	597,012	3,892,280	652.0%	-17.5	0.5034
	2040	536,675	3,940,366	734.2%	-18.5	0.4840
	2041	479,646	3,948,634	823.2%	-19.5	0.4654
	2042	426,195	3,917,366	919.1%	-20.5	0.4475
	2043	376,428	3,849,246	1022.6%	-21.5	0.4303
	2044	330,511	3,741,772	1132.1%	-22.5	0.4138
	2045	288,455	3,602,901	1249.0%	-23.5	0.3978
	2046	250,210	3,437,102	1373.7%	-24.5	0.3825
	2047	215,706	3,239,545	1501.8%	-25.5	0.3678
	2048	184,833	3,011,845	1629.5%	-26.5	0.3537
	2049	157,442	2,768,046	1758.1%	-27.5	0.3401
	2050	133,372	2,512,574	1883.9%	-28.5	0.3270
	2051	112,394	2,253,123	2004.7%	-29.5	0.3144
2052	94,261	1,995,884	2117.4%	-30.5	0.3023	
2053	78,723	1,750,410	2223.5%	-31.5	0.2907	
2054	65,505	1,525,921	2329.5%	-32.5	0.2795	
2055	54,323	1,323,387	2436.2%	-33.5	0.2688	
2056	44,932	1,144,651	2547.5%	-34.5	0.2584	
2057	37,088	983,577	2652.0%	-35.5	0.2485	
2058	30,559	841,100	2752.4%	-36.5	0.2389	
2059	25,172	719,702	2859.1%	-37.5	0.2297	
2060	20,712	615,649	2972.4%	-38.5	0.2209	
2061	17,033	522,464	3067.4%	-39.5	0.2124	
	Past	33,398,291	1,506,947	4.5%		
	Future	25,387,301	93,418,587	368.0%		
	Lifetime	58,785,592	94,925,534	161.5%		
Interest	4.00%					
	Past w/ int	44,042,055	1,661,694	3.8%		
	Future w/ int	17,908,156	46,445,658	259.4%		
	Lifetime w/ int	61,950,211	48,107,352	77.7%		



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MR. JORGE GOMES
SENIOR VICE PRESIDENT
LIFECARE ASSURANCE COMPANY
SENT VIA EMAIL ONLY TO LOGA CROSSETTE-THAMBIAH:
LOGA.CROSSETTE.THAMBIAH@LIFECAREASSURANCE.COM

February 11, 2022

Re: Assurity Life Insurance Company - NAIC 71439

Dear Mr. Gomes,

This letter will serve as the Company's authorization for LifeCare Assurance Company, Long Term Care Administrators, to file Long Term Care products on behalf of Assurity Life Insurance Company. This authorizes LifeCare to file on our behalf from today through December 31, 2022.

Sincerely,

/s/ Jill D. Fiddler