Filing at a Glance

Company:	MedAmerica Insurance Company
Product Name:	Long-Term Care
State:	Virginia
TOI:	LTC03I Individual Long Term Care
Sub-TOI:	LTC03I.001 Qualified
Filing Type:	Form/Rate
Date Submitted:	05/02/2018
SERFF Tr Num:	MILL-131333141
SERFF Status:	Closed-Approved
State Tr Num:	MILL-131333141
State Status:	Approved
Co Tr Num:	CICA - MEDAMERICA
Implementation Date Requested:	On Approval
Author(s):	Courtney Williamson, Travis Reisch, Shawn Stender, Jack Bridges, Joe Neary, Dexter Mosley, Cassi Noel, Megan Anderson, Peder Swenson, Derek Lesniak, Matt Mickolichek, Lola Heimlich
Reviewer(s):	Bill Dismore (primary)
Disposition Date:	09/04/2020
Disposition Status:	Approved
Implementation Date:	

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

General Information

Project Name: CICA LTC Rate Increase Filing
Project Number: 145MAI01-40.03
Requested Filing Mode: Review & Approval

Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact: 130%

Deemer Date: 01/10/2020
Submitted By: Michael Emmert

Status of Filing in Domicile: Not Filed
Date Approved in Domicile:
Domicile Status Comments: This filing has not yet been submitted in Pennsylvania.

Market Type: Individual
Individual Market Type:
Filing Status Changed: 09/04/2020
State Status Changed: 09/04/2020
Created By: Cassi Noel
Corresponding Filing Tracking Number:
State TOI: LTC03I Individual Long Term Care

Filing Description:

On behalf of MedAmerica Insurance Company (MedAmerica), we are submitting the referenced rate filing for your review. This is an existing individual policy form that provides long-term care coverage on a reimbursement basis. This policy form was written by CICA and issued in Virginia between April 1, 1999 and October 4, 2006. The form is no longer being marketed in any jurisdiction.

In 2008, MedAmerica acquired the long-term care block of business issued by CICA from Ace Ltd. and subsequently submitted a certificate of assumption filing. As a result, most of the nationwide policies are now on MedAmerica paper; however, approximately 16% of the policyholders nationwide objected to the assumption filing and remain on CICA paper. In Virginia, approximately 13% of the in-force policies are on CICA paper. MedAmerica has 100% of the risk on these series, including policies on CICA paper, and administers and manages the entire block.

The company is requesting the approval of a premium rate increase on this form, including all associated riders. This form is in need of a premium rate increase due to emerging and projected experience running more adverse than previously expected. The company is requesting a premium rate increase on policies with compound inflation protection. No rate increase is being requested on policies without inflation protection. The rate increase level was determined to vary by inflation option to better align the rate increase with the adverse experience.

There have been no previous rate revisions on this form. The company is seeking this current rate increase request to help alleviate the poor performance on this block of business. The rate level requested in this jurisdiction is the same as that requested nationwide, except where limited by regulatory restrictions.

The company will offer insureds affected by the premium increase the option of reducing their policy benefits to provide flexibility of choice for those insureds who wish to maintain a premium level reasonably similar to what they were paying prior to the rate increase. The company will offer a contingent benefit upon lapse to insureds that trigger a substantial rate increase. Additionally, the company will voluntarily offer a contingent benefit upon lapse to insureds affected by the rate increase, even if the increase is not considered substantial.

Enclosed with this submission is a policyholder notification letter, provided by the company, which is in compliance with 14VAC5-200-75. Additionally, a contingent nonforfeiture (CNF) benefit election form that is provided to policyholders alongside the notification letter is also being filed with the Bureau. Enclosed with this submission are the appropriate statement of variability, certification of compliance, and readability certification for these forms, as required.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Company and Contact

Filing Contact Information

Michael Emmert, Associate Actuary
8500 Normandale Lake Blvd.
Suite 1850
Minneapolis, MN 55437

michael.emmert@milliman.com
952-820-3116 [Phone]

Filing Company Information

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

MedAmerica Insurance Company
165 Court Street
Rochester, NY 14647
(800) 544-0327 ext. [Phone]

CoCode: 69515
Group Code: 1186
Group Name: Lifetime HealthCare Group
FEIN Number: 34-0977231

State of Domicile: Pennsylvania
Company Type: Life/Accident/Health
State ID Number:

Filing Fees

Fee Required?	No
Retaliatory?	No
Fee Explanation:	

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Bill Dismore	09/04/2020	09/04/2020

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Info has been requested from company	Bill Dismore	07/23/2020	07/23/2020
Info has been requested from company	Bill Dismore	11/19/2019	11/19/2019
Info has been requested from company	Bill Dismore	10/02/2019	10/02/2019
Info has been requested from company	Bill Dismore	01/09/2019	01/09/2019
Info has been requested from company	Bill Dismore	11/30/2018	11/30/2018
Info has been requested from company	Bill Dismore	10/09/2018	10/09/2018
Info has been requested from company	Bill Dismore	09/10/2018	09/10/2018
Info has been requested from company	Bill Dismore	09/04/2018	09/04/2018

Response Letters

Responded By	Created On	Date Submitted
Lola Heimlich	09/04/2020	09/04/2020
Cassi Noel	12/10/2019	12/10/2019
Dexter Mosley	10/25/2019	10/25/2019
Cassi Noel	01/16/2019	01/16/2019
Cassi Noel	12/05/2018	12/05/2018
Matt Mickolichek	11/19/2018	11/19/2018
Michael Emmert	09/21/2018	09/21/2018
Michael Emmert	09/07/2018	09/07/2018

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Supporting Document	L&H Actuarial Memorandum	Cassi Noel	11/12/2019	11/12/2019
Form	Notice of Premium Increase	Michael Emmert	05/22/2019	05/22/2019

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Form	Contingent Non-Forfeiture Benefit Election Form	Michael Emmert	05/22/2019	05/22/2019
Supporting Document	Certification of Compliance	Michael Emmert	05/22/2019	05/22/2019
Supporting Document	L&H Readability - Health	Michael Emmert	05/22/2019	05/22/2019
Supporting Document	Cover Letter	Dexter Mosley	01/29/2019	01/29/2019
Supporting Document	Response to January 17, 2019 Objection	Dexter Mosley	01/29/2019	01/29/2019
Supporting Document	L&H Actuarial Memorandum	Dexter Mosley	01/29/2019	01/29/2019
Supporting Document	Long Term Care Insurance Rate Request Summary	Dexter Mosley	01/29/2019	01/29/2019
Form	Notice of Premium Increase	Michael Emmert	08/31/2018	08/31/2018
Form	Contingent Non-Forfeiture Benefit Election Form	Michael Emmert	08/31/2018	08/31/2018
Form	Notice of Premium Increase	Dexter Mosley	08/31/2018	08/31/2018
Form	Contingent Non-Forfeiture Benefit Election Form	Dexter Mosley	08/31/2018	08/31/2018
Rate	Rate Tables	Dexter Mosley	08/31/2018	08/31/2018
Supporting Document	Product Checklist	Dexter Mosley	08/31/2018	08/31/2018
Supporting Document	Letters of Authorization	Dexter Mosley	08/31/2018	08/31/2018
Supporting Document	Response to July 20, 2018 Note to Filer	Dexter Mosley	08/31/2018	08/31/2018
Supporting Document	Certification of Compliance	Dexter Mosley	08/31/2018	08/31/2018
Supporting Document	L&H Actuarial Memorandum	Dexter Mosley	08/31/2018	08/31/2018
Supporting Document	Long Term Care Insurance Rate Request Summary	Dexter Mosley	08/31/2018	08/31/2018
Supporting Document	L&H Readability - Health	Dexter Mosley	08/31/2018	08/31/2018
Supporting Document	Cover Letter	Dexter Mosley	08/31/2018	08/31/2018
Supporting Document	Statements of Variability	Dexter Mosley	08/31/2018	08/31/2018

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Supporting Document	Current Rate Tables	Dexter Mosley	08/31/2018	08/31/2018

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Please respond to the outstanding objection.	Note To Filer	Bill Dismore	09/01/2020	09/03/2020
Extension Request for 7/23/2020 Objection Letter	Note To Reviewer	Cassi Noel	08/31/2020	08/31/2020
Updated Contact Information	Note To Reviewer	Cassi Noel	03/13/2020	03/13/2020
Status Update	Note To Filer	Bill Dismore	03/04/2020	03/04/2020
Status Update	Note To Reviewer	Cassi Noel	03/04/2020	03/04/2020
Extension Request for 11/19/2019	Note To Filer	Bill Dismore	11/22/2019	11/22/2019
Extension Request for 11/19/2019 Objection Letter	Note To Reviewer	Michael Emmert	11/21/2019	11/21/2019
Forms Withdrawn	Note To Filer	Elsie Andy	06/13/2019	06/13/2019
Policy Forms under 2 Different Companies (NAIC #'s)	Note To Filer	Bill Dismore	07/20/2018	07/20/2018
Status Update	Note To Filer	Bill Dismore	07/11/2018	07/11/2018
Status Update	Note To Reviewer	Michael Emmert	07/11/2018	07/11/2018
Actuarial Review - Final Summary Report	Reviewer Note	Bill Dismore	01/03/2020	
RRS	Reviewer Note	Bill Dismore	09/21/2018	

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Disposition

Disposition Date: 09/04/2020
Implementation Date:
Status: Approved

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):
MedAmerica Insurance Company	68.000%	68.000%	$108,033	147	$158,306	130.000%	0.000%

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document (revised)	Certification of Compliance	Received & Acknowledged	Yes
Supporting Document (revised)	Product Checklist	Received & Acknowledged	Yes
Supporting Document (revised)	L&H Actuarial Memorandum	Received & Acknowledged	Yes
Supporting Document (revised)	Long Term Care Insurance Rate Request Summary	Received & Acknowledged	Yes
Supporting Document (revised)	L&H Readability - Health	Withdrawn	Yes
Supporting Document (revised)	Cover Letter	Received & Acknowledged	Yes
Supporting Document (revised)	Letters of Authorization	Received & Acknowledged	Yes
Supporting Document (revised)	Statement of Variability	Received & Acknowledged	Yes
Supporting Document (revised)	Current Rate Tables	Received & Acknowledged	Yes
Supporting Document	Response to July 20, 2018 Note to Filer	Received & Acknowledged	Yes
Supporting Document	Response to September 4, 2018 Objection Letter	Received & Acknowledged	Yes
Supporting Document	Response to September 10, 2018 Objection	Received & Acknowledged	Yes
Supporting Document	Claims and Administration Processing Plan	Received & Acknowledged	Yes
Supporting Document	Response to October 9, 2018 Objection	Received & Acknowledged	Yes
Supporting Document	Response to November 30, 2018 Objection	Received & Acknowledged	Yes
Supporting Document	Response to January 9, 2019 Objection	Received & Acknowledged	Yes
Supporting Document	Response to January 17, 2019 Objection	Received & Acknowledged	Yes
Supporting Document	Response to October 2, 2019 Objection	Received & Acknowledged	Yes
Supporting Document	Response to November 19, 2019 Objection	Received & Acknowledged	Yes

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Copy of Original Policy Form	Received & Acknowledged	Yes
Supporting Document	Certification of Compliance	Withdrawn	No
Supporting Document	Certification of Compliance	Withdrawn	No
Supporting Document	Product Checklist	Withdrawn	No
Supporting Document	L&H Actuarial Memorandum	Withdrawn	No
Supporting Document	L&H Actuarial Memorandum	Withdrawn	No
Supporting Document	L&H Actuarial Memorandum	Withdrawn	No
Supporting Document	Long Term Care Insurance Rate Request Summary	Withdrawn	No
Supporting Document	Long Term Care Insurance Rate Request Summary	Withdrawn	No
Supporting Document	Long Term Care Insurance Rate Request Summary	Withdrawn	No
Supporting Document	L&H Readability - Health	Withdrawn	No
Supporting Document	L&H Readability - Health	Withdrawn	No
Supporting Document	Cover Letter	Withdrawn	No
Supporting Document	Cover Letter	Withdrawn	No
Supporting Document	Letters of Authorization	Withdrawn	No
Supporting Document	Statements of Variability	Withdrawn	No
Supporting Document	Statements of Variability	Withdrawn	No
Supporting Document	Current Rate Tables	Withdrawn	No
Supporting Document	Current Rate Tables	Withdrawn	No
Form (revised)	Notice of Premium Increase	Withdrawn	Yes
Form (revised)	Notice of Premium Increase	Withdrawn	Yes
Form (revised)	Contingent Non-Forfeiture Benefit Election Form	Withdrawn	Yes
Form (revised)	Contingent Non-Forfeiture Benefit Election Form	Withdrawn	Yes
Form	Notice of Premium Increase	Withdrawn	No
Form	Notice of Premium Increase	Withdrawn	No
Form	Notice of Premium Increase	Withdrawn	No
Form	Contingent Non-Forfeiture Benefit Election Form	Withdrawn	No
Form	Contingent Non-Forfeiture Benefit Election Form	Withdrawn	No
Form	Contingent Non-Forfeiture Benefit Election Form	Withdrawn	No
Rate (revised)	Rate Tables	Approved	Yes
Rate	Rate Tables	Approved	Yes

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate	Rate Tables	Approved	Yes
Rate	Rate Tables	Approved	Yes
Rate	Rate Tables	Withdrawn	No
Rate	Rate Tables	Withdrawn	No
Rate	Rate Tables	Withdrawn	No

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	07/23/2020
Submitted Date	07/23/2020
Respond By Date	09/30/2020

Dear Michael Emmert,

Introduction:

The final approval of this filing is contingent upon the approval of a related filing as described below.

Objection 1

Comments: This filing is pending until the policyholder notification forms filed under SERFF #MILL-131285847 are ready for approval. Once the BOI notifies the company the policyholder notification forms are ready for approval, please respond to this objection.

Conclusion:

We shall be glad to reconsider this submission upon receipt of notification that the related filing is ready for approval.

Should you wish to discuss any of the objections or provide additional information related to any of the objections, this should be done prior to making a new SERFF submission.

Thank you for your courtesy and consideration in this matter.

Sincerely,

Bill Dismore

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	11/19/2019
Submitted Date	11/19/2019
Respond By Date	12/10/2019

Dear Michael Emmert,

Introduction:

One or more forms included within the submission were found to be in non-conformity with statutory, regulatory or administrative requirements as set forth below.

Objection 1

Comments: 1. Please provide a copy of the approved policy form 14515-VA.

2. Please explain why the Statement of Variability was provided under the Supporting Documentation tab for CMCRIL-VA-0318 CMCNF-0318. It is believed that the forms have been withdrawn and are filed under MILL-131285847.

3. Please provide a "John Doe" version of the policyholder notification package under the Supporting Documentation tab that will used to notify policyholders of the rate increase.

Objection 2

- Long Term Care Insurance Rate Request Summary (Supporting Document)

Comments: The "Average Requested Percentage Rate Change Per Member is listed as 82%. Under the Rate/Rule Schedule, Company Rate Information, the Overall % Rate Impact is reported as 68%. Please explain why they are different.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the revised forms to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

Should you wish to discuss any of the objections or provide additional information related to any of the objections, this should be done prior to making a new SERFF submission.

Thank you for your courtesy and consideration in this matter.

Sincerely,
Bill Dismore

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	10/02/2019
Submitted Date	10/02/2019
Respond By Date	11/01/2019

Dear Michael Emmert,

Introduction:

The submission is DISAPPROVED and may not be used in the Commonwealth of Virginia.

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

- L&H Actuarial Memorandum (Supporting Document)

Comments: The BOI has the following concerns regarding the request for rate increase:

a.Explain the reason for the large increase given that most of the premium has been earned on this block.

b.Explain why such a large increase considering the fact there has been no increase since the acquisition of this block of business in 2008.

c.In accordance with 14VAC5-200-125 A. 1. (2). (b). explain why a plan of action was not submitted to the Virginia Bureau of Insurance, including a timeframe for the reestablishment of adequate margins for moderately adverse experience. We note that the Company reported that the premium rates were insufficient in both the 2016 and 2017 Long Term Care Annual Reports for both pre and post stability policies (SERFF #s MEAM-131082302 (2017); MEAM-130704921 (2016); MEAM-131082301 (2017); MEAM-130704926 (2016).

d.Explain the drivers of the current rate increase request for 130% that differs from those considered in the past filing (MILL-129349264) in which the increase requested was 38%. Explain the time value of money impact that the rate increase delay had on the current rate request.

e.Provide an explanation for the Companys non-response to objections filed under SERFF MILL-129349264 submitted in 7/2015.

Objection 2

- L&H Actuarial Memorandum (Supporting Document)

- Notice of Premium Increase, (Form)

Comments: The Company states in the actuarial memorandum and in the policyholder notification letter that a policyholder may offset the increased premium by reducing the level of benefits.

a.Please describe in detail the reduction in benefit options.

b.Are these considered landing spots?

c.Out of concern for policyholder equity, please provide several examples of the variability in the relative present value of each reduction in benefit option available in lieu of an increase from the individual policyholder perspective.

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Objection 3

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please justify the 130% increase for post-stability plans with inflation protection given that the results of Loss Ratio Testing required by 14VAC5-200-150 and 153 indicate that the pre-stability policies pass the test with the rate increase and adjustment for active life reserves (65%) but post-stability policies fail the test both with no Increase in future projections adjusted for active life reserves (48%) and with the proposed increase adjusted for active life reserves (27%).

Objection 4

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please explain the differential in the cumulative rate increase in Virginia compared to the nationwide cumulative increase to assure the BOI that rate subsidization is not occurring. The current cumulative rate increase request of 130% exceeds the current round of approved cumulative increases, 49%, amongst states where the company has reached a resolution.

Objection 5

- L&H Actuarial Memorandum (Supporting Document)

Comments: 1. What is the Companys plan regarding future rate increases if the requested increase is not approved in full?

2. If the full rate increase is approved, is the Company willing to certify that no future rate increases will take place?

Conclusion:

We shall be glad to reconsider this submission upon receipt of the requested information to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

A response to this objection (or request for information if more applicable) is expected within 30 days. After 30 days, the filing will be DISAPPROVED unless a 30-day extension is requested.

Once a submission has been closed, a new SERFF submission will be required. To expedite the review, the new submission should reference the SERFF tracking number of the prior submission and verify that all outstanding issues have been addressed.

Should you wish to discuss any of the objections or provide additional information related to any of the objections, this should be done prior to making a new SERFF submission.

Thank you for your courtesy and consideration in this matter.

Sincerely,
Bill Dismore

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	01/09/2019
Submitted Date	01/09/2019
Respond By Date	02/07/2019

Dear Michael Emmert,

Introduction:

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

Comments: Rate/Rule Schedule

1) Please revise the Minimum % Change to 0% since we understand that the Company is requesting 130% for benefits with inflation protection but 0% increase for those policies that do not offer inflation protection. The Overall % Indicated Change and Overall % Rate Impact will also need to be revised.

2) Please advise if the proposed rate increase were to be approved as requested and the future experience develops as expected under moderately adverse conditions, is the company able to certify that no future rate increases would be requested.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the requested information to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned. Thank you.

Sincerely,
Bill Dismore

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	11/30/2018
Submitted Date	11/30/2018
Respond By Date	12/14/2018

Dear Michael Emmert,

Introduction:

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

- L&H Actuarial Memorandum (Supporting Document)

Comments: 1. Please provide the policyholder count for this block by age band (i.e. <40; 40-44; 45-49; 50-54; 55-59; 60-64; 65-69; 70-74; 75+)

2. Given the fact that the policies were first issued in April of 1999 and that the block was acquired in 2008, provide an explanation as to why a rate increase was not requested prior to this rate filing.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the requested information to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned. Thank you.

Sincerely,
Bill Dismore

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	10/09/2018
Submitted Date	10/09/2018
Respond By Date	

Dear Michael Emmert,

Introduction:

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

- L&H Actuarial Memorandum (Supporting Document)

Comments: 1.Please provide the weighted average valuation interest rate separately for pre- and post-stability.

2.Please provide the historical claim count for this particular block.

3.For all projections requested in the next question, the baseline should comply with the following:

a.All projections should be provided in Excel format.

b.Limited-pay policies in paid-up status should be removed, both from historical experience and future projections.

c.For the pre-stability block, assumptions should use a best-estimate basis; for post-stability, appropriate margins for moderately adverse conditions are allowed.

d.Premiums should be at the Virginia rate level for both historical and projected future.

e.Please use the average maximum valuation interest rate corresponding to the pre-stability and post-stability blocks.

4.Because the Bureau has observed over the years that the anticipated experience of policies with and without lifetime benefits is often markedly different, for each of the four subsets of the business corresponding to the combinations of (lifetime/limited benefit periods) and (no inflation/with inflation protection), please provide the following projections on a nationwide basis:

a.current assumptions and current rates

b.current assumptions and current rates, using actual nationwide premiums (not Virginia rate level)

c.current assumptions and current rates, including paid-up policies (if any)

d.current assumptions with the proposed rate increase

e.current assumptions with the proposed rate increase, but with no shock lapses, benefit reductions, CBUL, or adverse selection

f.current assumptions with premiums restated as if the proposed rate schedule had been in effect from inception

g.original assumptions and original premiums from inception

h.actual past experience (claims, mortality, lapse) but original assumptions in the future, with all premiums at the original premium scale from inception.

Projections a-h can be separate Excel tabs or combined into separate columns on the same exhibit.

5.For each of the four subsets of the business above, please provide the active life reserves balance as of the projection date on a nationwide basis.

6.For each of the four subsets of the business above, please provide the policy count as of the projection date in Virginia.

7.Please provide the projections supporting Attachments C-1, C-2 and C-3.

8.Pursuant to 14VAC5-200-153.G.2., the original anticipated lifetime loss ratio should be substituted for 58% in the loss ratio test, if higher. Please revise Attachments E-1, E-2 and E-3 as appropriate. Please also provide the projections supporting these calculations.

Conclusion:

We shall be glad to continue our review of this submission upon receipt of the requested information or resolution of the issues noted above. Should you need clarification, please contact me. Thank you.

Sincerely,
Bill Dismore

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	09/10/2018
Submitted Date	09/10/2018
Respond By Date	

Dear Michael Emmert,

Introduction:

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please confirm if the Company provided the experience and supporting documentation only for form 14515-VA, 14531, 14532, 14533 and not for other companies or forms that were not filed and approved in Virginia, and to which the proposed rate increase does not apply in Virginia if approved. In Virginia, it is not considered appropriate to justify a rate increase by combining the experience of other forms issued by the company, affiliated companies or blocks of business that the company administers or manages. If the experience includes other forms not approved in VA, please provide revised experience exhibits only for VA approved forms.

Objection 2

- Notice of Premium Increase, CMRIL-VA-0318 (Form)

Comments: 1) Will the policyholder receive a revised schedule page if an option is elected? If so, please provide a copy of the form and the date approved, including the SERFF or State tracking number if available.

2)Pursuant to 14VAC5-200-75 A 4 b, please include a statement in the form regarding the policyholders right to a revised premium rate or rate schedule if the premium rate or rate schedule is changed.

3) Pursuant to 14VAC5-200-75 D 2 C, the form is required to include a disclosure that some benefit reduction options may result in a loss in partnership status that may reduce policyholder protections, if applicable. Please advise if applicable; if so, please revise the policyholder notification letter accordingly.

4) Pursuant to 14VAC 5-100-40 A 3, please include a certification similar to the following for the policyholder notification letter, or any other filed form if applicable.
A statement identical to the following which is signed by the General Counsel or an officer of the company or any attorney or actuary representing the company: The company has reviewed the enclosed policy form(s) and certifies that, to the best of its knowledge and belief, each form submitted is consistent and complies with the requirements of Title 38.2 of the Code of Virginia and the regulations promulgated pursuant thereto.

5) Prior to resubmitting, the company may wish to review the requirements of 14VAC5-200-75 D and 14VAC5-100 et seq. to ensure that all applicable requirements have been met.

Conclusion:

We shall be glad to continue our review of this submission upon receipt of the requested information or resolution of the issues noted above. Should you need clarification, please contact me. Thank you.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Sincerely,
Bill Dismore

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	09/04/2018
Submitted Date	09/04/2018
Respond By Date	

Dear Michael Emmert,

Introduction:

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

- L&H Actuarial Memorandum (Supporting Document)

Comments: 1. Please provide a description of the originally filed expense assumptions referred to in section 5. h.

2. Provide an explanation as to why active life reserves and reserves for the election of a CBUL have not been used in the experience exhibits for this rate increase analysis as stated in section 12. Reserves. As required by 14VAC5-200-153 B 3 b. disclose how reserves have been incorporated in this rate increase since it will trigger the contingent benefit upon lapse.

3. Provide an exhibit that shows the rate revision status in each state in which these policy forms have active policyholders.

Conclusion:

We shall be glad to continue our review of this submission upon receipt of the requested information or resolution of the issues noted above. Should you need clarification, please contact me. Thank you.

Sincerely,
Bill Dismore

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	09/04/2020
Submitted Date	09/04/2020

Dear Bill Dismore,

Introduction:

Please see below.

Response 1

Comments:

The policyholder notification forms filed under SERFF #MILL-131285847 were approved on September 3, 2020.

Related Objection 1

Comments: This filing is pending until the policyholder notification forms filed under SERFF #MILL-131285847 are ready for approval. Once the BOI notifies the company the policyholder notification forms are ready for approval, please respond to this objection.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you for working with us to complete this filing. Please let us know if you have any additional questions.

Sincerely,

Courtney Williamson

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/10/2019
Submitted Date	12/10/2019

Dear Bill Dismore,

Introduction:

Please see below.

Response 1

Comments:

Please see the attached letter in response to your November 19 requests. The response letter was prepared by MedAmerica Insurance Company. Milliman did not audit the attached response letter, but did review it for reasonableness.

Related Objection 1

Comments: 1. Please provide a copy of the approved policy form 14515-VA.

2. Please explain why the Statement of Variability was provided under the Supporting Documentation tab for CMCRIL-VA-0318 CMCNF-0318. It is believed that the forms have been withdrawn and are filed under MILL-131285847.

3. Please provide a "John Doe" version of the policyholder notification package under the Supporting Documentation tab that will used to notify policyholders of the rate increase.

Changed Items:

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Supporting Document Schedule Item Changes	
Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA_Rate Request Summary_MedAmerica_20191210.pdf
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_MedAmerica_20190129.pdf*
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_MedAmerica_20180830.pdf*
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_Final_20180502.pdf*

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA_Rate Request Summary_MedAmerica_20191210.pdf
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_MedAmerica_20190129.pdf*
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_MedAmerica_20180830.pdf*
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_Final_20180502.pdf*

Satisfied - Item:	Statement of Variability
Comments:	This Statement of Variability is provided for informational purposes. This Statement of Variability is being filed under SERFF tracking number MILL-131285847.
Attachment(s):	Statement of Variability CICA Assumed Product Line 12.10.19.pdf
Previous Version	
Satisfied - Item:	*Statements of Variability*
Comments:	
Attachment(s):	*CMCRIL-VA-0318 CMCNF-0318 Statement of Variability.pdf*
Previous Version	
Satisfied - Item:	*Statements of Variability*
Comments:	
Attachment(s):	*CMCRIL-VA-0318 CMCNF-0318 Statement of Variability.pdf* *CRIL-VA-0318 CCNF-VA-0318 Statement of Variability.pdf*

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA_Rate Request Summary_MedAmerica_20191210.pdf
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_MedAmerica_20190129.pdf*
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_MedAmerica_20180830.pdf*
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_Final_20180502.pdf*

Satisfied - Item:	Statement of Variability
Comments:	This Statement of Variability is provided for informational purposes. This Statement of Variability is being filed under SERFF tracking number MILL-131285847.
Attachment(s):	Statement of Variability CICA Assumed Product Line 12.10.19.pdf
Previous Version	
Satisfied - Item:	*Statements of Variability*
Comments:	
Attachment(s):	*CMCRIL-VA-0318 CMCNF-0318 Statement of Variability.pdf*
Previous Version	
Satisfied - Item:	*Statements of Variability*
Comments:	
Attachment(s):	*CMCRIL-VA-0318 CMCNF-0318 Statement of Variability.pdf* *CRIL-VA-0318 CCNF-VA-0318 Statement of Variability.pdf*

Satisfied - Item:	Response to November 19, 2019 Objection
Comments:	

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Attachment(s):	VA CICA-MedAmerica Response_20191210 Objection Letter_20191119.pdf

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA_Rate Request Summary_MedAmerica_20191210.pdf
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_MedAmerica_20190129.pdf*
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_MedAmerica_20180830.pdf*
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_Final_20180502.pdf*

Satisfied - Item:	Statement of Variability
Comments:	This Statement of Variability is provided for informational purposes. This Statement of Variability is being filed under SERFF tracking number MILL-131285847.
Attachment(s):	Statement of Variability CICA Assumed Product Line 12.10.19.pdf
Previous Version	
Satisfied - Item:	*Statements of Variability*
Comments:	
Attachment(s):	*CMCRIL-VA-0318 CMCNF-0318 Statement of Variability.pdf*
Previous Version	
Satisfied - Item:	*Statements of Variability*
Comments:	
Attachment(s):	*CMCRIL-VA-0318 CMCNF-0318 Statement of Variability.pdf* *CRIL-VA-0318 CCNF-VA-0318 Statement of Variability.pdf*

Satisfied - Item:	Response to November 19, 2019 Objection
Comments:	

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Attachment(s):	VA CICA-MedAmerica Response_20191210 Objection Letter_20191119.pdf

Satisfied - Item:	Copy of Original Policy Form
Comments:	
Attachment(s):	14515-VA Approved Policy Form.pdf

No Form Schedule items changed.

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Rate/Rule Schedule Item Changes

Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	Rate Tables	14515-VA	Revised	Previous State Filing Number: This form and all associated riders were originally approved in 1998. Percent Rate Change Request: 68	VA_CICA-MedAmerica_Proposed_Rate Tables_515 Series_20191025.pdf,	12/10/2019 By: Michael Emmert
Previous Version						
1	*Rate Tables*	*14515-VA*	*Revised*	*Previous State Filing Number: This form and all associated riders were originally approved in 1998. Percent Rate Change Request: 108*	*VA_CICA-MedAmerica_Proposed_Rate Tables_515 Series_20191025.pdf,*	*10/25/2019 By: Michael Emmert*
Previous Version						
1	*Rate Tables*	*14515-VA*	*Revised*	*Previous State Filing Number: This form and all associated riders were originally approved in 1998. Percent Rate Change Request: 130*	*VA_MedAmerica_Proposed Rate Tables_515 Series_20180830.pdf,*	*08/31/2018 By:*
Previous Version						
1	*Rate Tables*	*14515-VA*	*Revised*	*Previous State Filing Number: This form and all associated riders were originally approved in 1998. Percent Rate Change*	*VA_CICA_Proposed Rate Tables_515 Series_20180502.pdf,*	*05/02/2018 By: Michael Emmert*

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Rate/Rule Schedule Item Changes

				Request: 130		

Response 2

Comments:

Please see above.

Related Objection 2

Applies To:

- Long Term Care Insurance Rate Request Summary (Supporting Document)

Comments: The "Average Requested Percentage Rate Change Per Member is listed as 82%. Under the Rate/Rule Schedule, Company Rate Information, the Overall % Rate Impact is reported as 68%. Please explain why they are different.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you for working with us to complete this filing. Please let us know if you have any additional questions.

Sincerely,
Michael Emmert

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	10/25/2019
Submitted Date	10/25/2019

Dear Bill Dismore,

Introduction:

Please see below.

Response 1

Comments:

Please see the attached letter in response to your October 2, 2019 requests. The response letter was prepared by MedAmerica Insurance Company. Milliman did not audit the attached response letter, but did review it for reasonableness.

Related Objection 1

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: The BOI has the following concerns regarding the request for rate increase:

a.Explain the reason for the large increase given that most of the premium has been earned on this block.

b.Explain why such a large increase considering the fact there has been no increase since the acquisition of this block of business in 2008.

c.In accordance with 14VAC5-200-125 A. 1. (2). (b). explain why a plan of action was not submitted to the Virginia Bureau of Insurance, including a timeframe for the reestablishment of adequate margins for moderately adverse experience. We note that the Company reported that the premium rates were insufficient in both the 2016 and 2017 Long Term Care Annual Reports for both pre and post stability policies (SERFF #s MEAM-131082302 (2017); MEAM-130704921 (2016); MEAM-131082301 (2017); MEAM-130704926 (2016).

d.Explain the drivers of the current rate increase request for 130% that differs from those considered in the past filing (MILL-129349264) in which the increase requested was 38%. Explain the time value of money impact that the rate increase delay had on the current rate request.

e.Provide an explanation for the Companys non-response to objections filed under SERFF MILL-129349264 submitted in 7/2015.

Changed Items:

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Current Rate Tables
Comments:	
Attachment(s):	VA_CICA-MedAmerica_Current_Rate Tables_515 Series_20191025.pdf
Previous Version	
Satisfied - Item:	*Current Rate Tables*
Comments:	
Attachment(s):	*VA_MedAmerica_Current Rate Tables_515 Series_20180830.pdf*
Previous Version	
Satisfied - Item:	*Current Rate Tables*
Comments:	
Attachment(s):	*VA_CICA_Current Rate Tables_515 Series_20180502.pdf*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Current Rate Tables
Comments:	
Attachment(s):	VA_CICA-MedAmerica_Current_Rate Tables_515 Series_20191025.pdf
Previous Version	
Satisfied - Item:	*Current Rate Tables*
Comments:	
Attachment(s):	*VA_MedAmerica_Current Rate Tables_515 Series_20180830.pdf*
Previous Version	
Satisfied - Item:	*Current Rate Tables*
Comments:	
Attachment(s):	*VA_CICA_Current Rate Tables_515 Series_20180502.pdf*

Satisfied - Item:	Response to October 2, 2019 Objection
Comments:	
Attachment(s):	VA CICA-MedAmerica Response_20191025 Objection Letter_20191002.pdf

No Form Schedule items changed.

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Rate/Rule Schedule Item Changes

Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	Rate Tables	14515-VA	Revised	Previous State Filing Number: This form and all associated riders were originally approved in 1998. Percent Rate Change Request: 108	VA_CICA-MedAmerica_Proposed_Rate Tables_515 Series_20191025.pdf,	10/25/2019 By: Michael Emmert
Previous Version						
1	*Rate Tables*	*14515-VA*	*Revised*	*Previous State Filing Number: This form and all associated riders were originally approved in 1998. Percent Rate Change Request: 130*	*VA_MedAmerica_Proposed Rate Tables_515 Series_20180830.pdf,*	*08/31/2018 By:*
Previous Version						
1	*Rate Tables*	*14515-VA*	*Revised*	*Previous State Filing Number: This form and all associated riders were originally approved in 1998. Percent Rate Change Request: 130*	*VA_CICA_Proposed Rate Tables_515 Series_20180502.pdf,*	*05/02/2018 By: Michael Emmert*

Response 2

Comments:

See above.

Related Objection 2

Applies To:

- L&H Actuarial Memorandum (Supporting Document)
- Notice of Premium Increase, (Form)

Comments: The Company states in the actuarial memorandum and in the policyholder notification letter that a policyholder may offset the increased premium by reducing the level of benefits.

a.Please describe in detail the reduction in benefit options.

b.Are these considered landing spots?

c.Out of concern for policyholder equity, please provide several examples of the variability in the relative present value of each reduction in benefit option available in lieu of an increase from the individual policyholder perspective.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 3

Comments:

See above.

Related Objection 3

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please justify the 130% increase for post-stability plans with inflation protection given that the results of Loss Ratio Testing required by 14VAC5-200-150 and 153 indicate that the pre-stability policies pass the test with the rate increase and adjustment for active life reserves (65%) but post-stability policies fail the test both with no Increase in future projections adjusted for active life reserves (48%) and with the proposed increase adjusted for active life reserves (27%).

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 4

Comments:

See above.

Related Objection 4

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please explain the differential in the cumulative rate increase in Virginia compared to the nationwide cumulative increase to assure the BOI that rate subsidization is not occurring. The current cumulative rate increase request of 130% exceeds the current round of approved cumulative increases, 49%, amongst states where the company has reached a resolution.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 5

Comments:

See above.

Related Objection 5

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: 1. What is the Companys plan regarding future rate increases if the requested increase is not approved in full?

2. If the full rate increase is approved, is the Company willing to certify that no future rate increases will take place?

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

State:	Virginia	**Filing Company:**	MedAmerica Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long-Term Care		
Project Name/Number:	CICA LTC Rate Increase Filing/145MAI01-40.03		

Thank you for your assistance with this filing.

Sincerely,

Michael Emmert

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	01/16/2019
Submitted Date	01/16/2019

Dear Bill Dismore,

Introduction:

On behalf of Missy Gordon, thank you for reviewing this filing.

Response 1

Comments:

Please see the attached letter in response to your January 9, 2019 requests.

Related Objection 1

Comments: Rate/Rule Schedule

1) Please revise the Minimum % Change to 0% since we understand that the Company is requesting 130% for benefits with inflation protection but 0% increase for those policies that do not offer inflation protection. The Overall % Indicated Change and Overall % Rate Impact will also need to be revised.

2) Please advise if the proposed rate increase were to be approved as requested and the future experience develops as expected under moderately adverse conditions, is the company able to certify that no future rate increases would be requested.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response to January 9, 2019 Objection
Comments:	
Attachment(s):	VA_Response to 20190109 Objection_MedAmerica_20190116.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you for working with us to complete this filing. Please let us know if you have any additional questions.

Sincerely,

State:	Virginia	**Filing Company:**	MedAmerica Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long-Term Care		
Project Name/Number:	CICA LTC Rate Increase Filing/145MAI01-40.03		

Travis Reisch

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/05/2018
Submitted Date	12/05/2018

Dear Bill Dismore,

Introduction:

Please see below.

Response 1

Comments:

Please see the attached letter in response to your November 30, 2018 requests. The response letter was prepared by MedAmerica Insurance Company. Milliman did not audit the attached response letter, but did review it for reasonableness.

Related Objection 1

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: 1. Please provide the policyholder count for this block by age band (i.e. <40; 40-44; 45-49; 50-54; 55-59; 60-64; 65-69; 70-74; 75+)

2. Given the fact that the policies were first issued in April of 1999 and that the block was acquired in 2008, provide an explanation as to why a rate increase was not requested prior to this rate filing.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response to November 30, 2018 Objection
Comments:	
Attachment(s):	VA CICA-MedAmerica Response_20181204 Objection Letter_20181130.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you for your assistance with this filing.

Sincerely,

State: Virginia
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Filing Company: MedAmerica Insurance Company

Michael Emmert

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	11/19/2018
Submitted Date	11/19/2018

Dear Bill Dismore,

Introduction:

On behalf of Missy Gordon, thank you for reviewing this filing.

Response 1

Comments:

Please see the attached documents in response to your October 9, 2018 requests.

Related Objection 1

Applies To:

- *L&H Actuarial Memorandum (Supporting Document)*

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Comments: 1.Please provide the weighted average valuation interest rate separately for pre- and post-stability.

2.Please provide the historical claim count for this particular block.

3.For all projections requested in the next question, the baseline should comply with the following:

a.All projections should be provided in Excel format.

b.Limited-pay policies in paid-up status should be removed, both from historical experience and future projections.

c.For the pre-stability block, assumptions should use a best-estimate basis; for post-stability, appropriate margins for moderately adverse conditions are allowed.

d.Premiums should be at the Virginia rate level for both historical and projected future.

e.Please use the average maximum valuation interest rate corresponding to the pre-stability and post-stability blocks.

4.Because the Bureau has observed over the years that the anticipated experience of policies with and without lifetime benefits is often markedly different, for each of the four subsets of the business corresponding to the combinations of (lifetime/limited benefit periods) and (no inflation/with inflation protection), please provide the following projections on a nationwide basis:

a.current assumptions and current rates

b.current assumptions and current rates, using actual nationwide premiums (not Virginia rate level)

c.current assumptions and current rates, including paid-up policies (if any)

d.current assumptions with the proposed rate increase

e.current assumptions with the proposed rate increase, but with no shock lapses, benefit reductions, CBUL, or adverse selection

f.current assumptions with premiums restated as if the proposed rate schedule had been in effect from inception

g.original assumptions and original premiums from inception

h.actual past experience (claims, mortality, lapse) but original assumptions in the future, with all premiums at the original premium scale from inception.

Projections a-h can be separate Excel tabs or combined into separate columns on the same exhibit.

5.For each of the four subsets of the business above, please provide the active life reserves balance as of the projection date on a nationwide basis.

6.For each of the four subsets of the business above, please provide the policy count as of the projection date in Virginia.

7.Please provide the projections supporting Attachments C-1, C-2 and C-3.

8.Pursuant to 14VAC5-200-153.G.2., the original anticipated lifetime loss ratio should be substituted for 58% in the loss ratio test, if higher. Please revise Attachments E-1, E-2 and E-3 as appropriate. Please also provide the projections supporting these calculations.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Claims and Administration Processing Plan
Comments:	
Attachment(s):	MedAmerica Claims Procedures_20160128.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	Claims and Administration Processing Plan
Comments:	
Attachment(s):	MedAmerica Claims Procedures_20160128.pdf

Satisfied - Item:	Response to October 9, 2018 Objection
Comments:	
Attachment(s):	VA_Response to 20181009 Objection_MedAmerica_20181112.pdf Approaches to LTC Rate Increases 09-27-18_ProspectivePV.pdf VA_Response Attachments_MedAmerica_LRRS_20181112.xlsb

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you for your assistance with this filing.

Sincerely,

Michael Emmert

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	09/21/2018
Submitted Date	09/21/2018

Dear Bill Dismore,

Introduction:

Please see below.

Response 1

Comments:

Please see the attached response letter in response to your September 10 requests. The response letter was prepared by MedAmerica Insurance Company. Milliman did not audit the attached response letter, but did review it for reasonableness.

Related Objection 1

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please confirm if the Company provided the experience and supporting documentation only for form 14515-VA, 14531, 14532, 14533 and not for other companies or forms that were not filed and approved in Virginia, and to which the proposed rate increase does not apply in Virginia if approved. In Virginia, it is not considered appropriate to justify a rate increase by combining the experience of other forms issued by the company, affiliated companies or blocks of business that the company administers or manages. If the experience includes other forms not approved in VA, please provide revised experience exhibits only for VA approved forms.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response to September 10, 2018 Objection
Comments:	
Attachment(s):	VA CICA-MedAmerica Response_20180921 Objection Letter_20180910.pdf MedAmerica VA_Summary of Benefits Amendment.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 2

Comments:

Please see the attached response letter above.

Related Objection 2

Applies To:

- Notice of Premium Increase, CMRIL-VA-0318 (Form)

Comments: 1) Will the policyholder receive a revised schedule page if an option is elected? If so, please provide a copy of the form and the date approved, including the SERFF or State tracking number if available.

2)Pursuant to 14VAC5-200-75 A 4 b, please include a statement in the form regarding the policyholders right to a revised premium rate or rate schedule if the premium rate or rate schedule is changed.

3) Pursuant to 14VAC5-200-75 D 2 C, the form is required to include a disclosure that some benefit reduction options may result in a loss in partnership status that may reduce policyholder protections, if applicable. Please advise if applicable; if so, please revise the policyholder notification letter accordingly.

4) Pursuant to 14VAC 5-100-40 A 3, please include a certification similar to the following for the policyholder notification letter, or any other filed form if applicable.
A statement identical to the following which is signed by the General Counsel or an officer of the company or any attorney or actuary representing the company: The company has reviewed the enclosed policy form(s) and certifies that, to the best of its knowledge and belief, each form submitted is consistent and complies with the requirements of Title 38.2 of the Code of Virginia and the regulations promulgated pursuant thereto.

5) Prior to resubmitting, the company may wish to review the requirements of 14VAC5-200-75 D and 14VAC5-100 et seq. to ensure that all applicable requirements have been met.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you for your assistance with this filing.

Sincerely,
Michael Emmert

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	09/07/2018
Submitted Date	09/07/2018

Dear Bill Dismore,

Introduction:

Please see below.

Response 1

Comments:

Please see the attached response letter in response to your September 4 requests. The response letter was prepared by MedAmerica Insurance Company. Milliman did not audit the attached response letter, but did review it for reasonableness.

Related Objection 1

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: 1. Please provide a description of the originally filed expense assumptions referred to in section 5. h.

2. Provide an explanation as to why active life reserves and reserves for the election of a CBUL have not been used in the experience exhibits for this rate increase analysis as stated in section 12. Reserves. As required by 14VAC5-200-153 B 3 b. disclose how reserves have been incorporated in this rate increase since it will trigger the contingent benefit upon lapse.

3. Provide an exhibit that shows the rate revision status in each state in which these policy forms have active policyholders.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response to September 4, 2018 Objection Letter
Comments:	
Attachment(s):	VA CICA-MedAmerica Response_20180907 Objection Letter_20180904.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

State: Virginia
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03
Filing Company: MedAmerica Insurance Company

Conclusion:

Thank you for your assistance with this filing.

Sincerely,

Michael Emmert

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Amendment Letter

Submitted Date: 11/12/2019

Comments:

On behalf of Missy Gordon, attached is an updated actuarial memorandum reflecting the changes requested based on our understanding of the phone conversation between the Bureau and MedAmerica Insurance Company on October 30, 2019. Thank you for your assistance with this filing

Changed Items:

No Form Schedule Items Changed.

No Rate Schedule Items Changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA_Supplement_MedAmerica_LRRS_20180830.pdf VA_ActMemo_MedAmerica_LRRS_20191112.pdf
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA_ActMemo_MedAmerica_LRRS_20190129.pdf* *VA_Supplement_MedAmerica_LRRS_20180830.pdf*
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA_ActMemo_MedAmerica_LRRS_20180830.pdf* *VA_Supplement_MedAmerica_LRRS_20180830.pdf*
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA_ActMemo_CICA_LRRS_20180502.pdf* *VA_Supplement_CICA_LRRS_20180502.pdf*

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Amendment Letter

Submitted Date: 05/22/2019

Comments:

This filing has been updated for the removal of the policyholder notification letter and CNF letter. The forms are being filed under SERFF tracking #MILL-131285847.

Please let us know if you have any questions. Thank you for your assistance with this filing.

Changed Items:

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Form Schedule Item Changes

Item No.	Form Name	Form Number	Form Type	Form Action	Action Specific Data	Readability Score	Attachments	Submitted
1	Notice of Premium Increase		OTH	Other	Form moved to filing under SERFF tracking #MILL-131285847.			Date Submitted: 05/22/2019 By:
Previous Version								
1	*Notice of Premium Increase*	*CMRIL-VA-0318*	*OTH*	*Initial*		*45.300*	*CMRIL-VA-0318.pdf*	*Date Submitted: 08/31/2018 By:*
Previous Version								
1	*Notice of Premium Increase*	*CMRIL-VA-0318*	*OTH*	*Initial*		*45.300*	*CMRIL-VA-0318.pdf*	*Date Submitted: 05/02/2018 By: Michael Emmert*
2	Contingent Non-Forfeiture Benefit Election Form		OTH	Other	Form moved to filing under SERFF tracking #MILL-131285847.			Date Submitted: 05/22/2019 By:
Previous Version								
2	*Contingent Non-Forfeiture Benefit Election Form*	*CMCNF-VA-0318*	*OTH*	*Initial*		*57.300*	*CMCNF-VA-0318.pdf*	*Date Submitted: 08/31/2018 By:*
Previous Version								
2	*Contingent Non-Forfeiture Benefit Election Form*	*CMCNF-VA-0318*	*OTH*	*Initial*		*57.300*	*CMCNF-VA-0318.pdf*	*Date Submitted: 05/02/2018 By: Michael Emmert*

No Rate Schedule Items Changed.

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Supporting Document Schedule Item Changes	
Bypassed - Item:	Certification of Compliance
Bypass Reason:	Not applicable as this filing no longer includes the filing of forms. The forms have been moved to filing under SERFF tracking #MILL-131285847.
Attachment(s):	
Previous Version	
Satisfied - Item:	*Certification of Compliance*
Comments:	
Attachment(s):	*CMRIL-VA-0318 CMCNF-VA-0318 Certificate of Compliance Signed.pdf*
Previous Version	
Satisfied - Item:	*Certification of Compliance*
Comments:	
Attachment(s):	*CMRIL-VA-0318 CMCNF-VA-0318 Certificate of Compliance Signed.pdf* *CRIL-VA-0318 CCNF-VA-0318 Certificate of Compliance Signed.pdf*

Bypassed - Item:	L&H Readability - Health
Bypass Reason:	Not applicable as this filing no longer includes the filing of forms. The forms have been moved to filing under SERFF tracking #MILL-131285847.
Attachment(s):	
Previous Version	
Satisfied - Item:	*L&H Readability - Health*
Comments:	
Attachment(s):	*CMRIL-VA-0318 CMCNF-VA-0318 Readbility Signed.pdf*
Previous Version	
Satisfied - Item:	*L&H Readability - Health*
Comments:	
Attachment(s):	*CMRIL-VA-0318 CMCNF-VA-0318 Readbility Signed.pdf* *CRIL-VA-0318 CCNF-VA-0318 Readability Signed.pdf*

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Amendment Letter

Submitted Date: 01/29/2019

Comments:

Thank you for reviewing this filing. Please see the attached documents in response to your January 17 request. Please let us know if you have any questions. Thank you.

Changed Items:

No Form Schedule Items Changed.

No Rate Schedule Items Changed.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Cover Letter
Comments:	
Attachment(s):	VA_Cover Letter_MedAmerica_LRRS_20190129.pdf
Previous Version	
Satisfied - Item:	*Cover Letter*
Comments:	
Attachment(s):	*VA_Cover Letter_MedAmerica_LRRS_20180830.pdf*
Previous Version	
Satisfied - Item:	*Cover Letter*
Comments:	
Attachment(s):	*VA_Cover Letter_CICA_LRRS_20180502.pdf*

Satisfied - Item:	Response to January 17, 2019 Objection
Comments:	
Attachment(s):	VA_Response to 20190117 Objection_MedAmerica_20190129.pdf

Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA_ActMemo_MedAmerica_LRRS_20190129.pdf VA_Supplement_MedAmerica_LRRS_20180830.pdf
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA_ActMemo_MedAmerica_LRRS_20180830.pdf* *VA_Supplement_MedAmerica_LRRS_20180830.pdf*
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA_ActMemo_CICA_LRRS_20180502.pdf* *VA_Supplement_CICA_LRRS_20180502.pdf*

Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Attachment(s):	VA_Rate Request Summary_MedAmerica_20190129.pdf
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_MedAmerica_20180830.pdf*
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_Final_20180502.pdf*

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Amendment Letter

Submitted Date: 08/31/2018

Comments:

Thank you for reviewing this filing. Please see the attached documents in response to your July 20 note to filer. Please let us know if you have any questions. Thank you.

Changed Items:

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Form Schedule Item Changes

Item No.	Form Name	Form Number	Form Type	Form Action	Action Specific Data	Readability Score	Attachments	Submitted
1	Notice of Premium Increase		OTH	Other	Form moved to concurrent filing under SERFF tracking #MILL-131588701.			Date Submitted: 08/31/2018 By:
Previous Version								
1	*Notice of Premium Increase*	*CRIL-VA-0318*	*OTH*	*Initial*		*45.300*	*CRIL-VA-0318 4.27.18.pdf*	*Date Submitted: 05/02/2018 By: Michael Emmert*
2	Contingent Non-Forfeiture Benefit Election Form		OTH	Other	Form moved to concurrent filing under SERFF tracking #MILL-131588701.			Date Submitted: 08/31/2018 By:
Previous Version								
2	*Contingent Non-Forfeiture Benefit Election Form*	*CCNF-VA-0318*	*OTH*	*Initial*		*57.300*	*CCNF-VA-0318 3.20.18.pdf*	*Date Submitted: 05/02/2018 By: Michael Emmert*
3	Notice of Premium Increase	CMRIL-VA-0318	OTH	Initial		45.300	CMRIL-VA-0318.pdf	Date Submitted: 08/31/2018 By:
Previous Version								
3	*Notice of Premium Increase*	*CMRIL-VA-0318*	*OTH*	*Initial*		*45.300*	*CMRIL-VA-0318.pdf*	*Date Submitted: 05/02/2018 By: Michael Emmert*
4	Contingent Non-Forfeiture Benefit Election Form	CMCNF-VA-0318	OTH	Initial		57.300	CMCNF-VA-0318.pdf	Date Submitted: 08/31/2018 By:
Previous Version								
4	*Contingent Non-Forfeiture Benefit Election Form*	*CMCNF-VA-0318*	*OTH*	*Initial*		*57.300*	*CMCNF-VA-0318.pdf*	*Date Submitted: 05/02/2018 By: Michael Emmert*

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Rate/Rule Schedule Item Changes

Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	Rate Tables	14515-VA	Revised	Previous State Filing Number: This form and all associated riders were originally approved in 1998. Percent Rate Change Request: 130	VA_MedAmerica_Proposed Rate Tables_515 Series_20180830.pdf,	08/31/2018 By:
Previous Version						
1	*Rate Tables*	*14515-VA*	*Revised*	*Previous State Filing Number:* *This form and all associated riders were originally approved in 1998.* *Percent Rate Change Request:* *130*	*VA_CICA_Proposed Rate Tables_515 Series_20180502.pdf,*	*05/02/2018* *By: Michael Emmert*

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Product Checklist
Comments:	
Attachment(s):	VA_Rate Review Requirements Checklist_20180830.pdf
Previous Version	
Satisfied - Item:	*Product Checklist*
Comments:	
Attachment(s):	*VA_Rate Review Requirements Checklist_Final_20180502.pdf*

Satisfied - Item:	Letters of Authorization
Comments:	
Attachment(s):	Authorization to file MedAmerica 20180111.pdf
Previous Version	
Satisfied - Item:	*Letters of Authorization*
Comments:	
Attachment(s):	*Authorization to file MedAmerica 20180111.pdf* *Authorization to file_Combined Insurance 20171120.pdf*

Satisfied - Item:	Response to July 20, 2018 Note to Filer
Comments:	
Attachment(s):	VA_Response to 20180720 Note to Filer_MedAmerica_20180830.pdf

Satisfied - Item:	Certification of Compliance
Comments:	
Attachment(s):	CMRIL-VA-0318 CMCNF-VA-0318 Certificate of Compliance Signed.pdf
Previous Version	
Satisfied - Item:	*Certification of Compliance*
Comments:	
Attachment(s):	*CMRIL-VA-0318 CMCNF-VA-0318 Certificate of Compliance Signed.pdf* *CRIL-VA-0318 CCNF-VA-0318 Certificate of Compliance Signed.pdf*

Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA_ActMemo_MedAmerica_LRRS_20180830.pdf VA_Supplement_MedAmerica_LRRS_20180830.pdf

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA_ActMemo_CICA_LRRS_20180502.pdf* *VA_Supplement_CICA_LRRS_20180502.pdf*

Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA_Rate Request Summary_MedAmerica_20180830.pdf
Previous Version	
Satisfied - Item:	*Long Term Care Insurance Rate Request Summary*
Comments:	
Attachment(s):	*VA_Rate Request Summary_Final_20180502.pdf*

Satisfied - Item:	L&H Readability - Health
Comments:	
Attachment(s):	CMRIL-VA-0318 CMCNF-VA-0318 Readbility Signed.pdf
Previous Version	
Satisfied - Item:	*L&H Readability - Health*
Comments:	
Attachment(s):	*CMRIL-VA-0318 CMCNF-VA-0318 Readbility Signed.pdf* *CRIL-VA-0318 CCNF-VA-0318 Readability Signed.pdf*

Satisfied - Item:	Cover Letter
Comments:	
Attachment(s):	VA_Cover Letter_MedAmerica_LRRS_20180830.pdf
Previous Version	
Satisfied - Item:	*Cover Letter*
Comments:	
Attachment(s):	*VA_Cover Letter_CICA_LRRS_20180502.pdf*

Satisfied - Item:	Statements of Variability
Comments:	
Attachment(s):	CMCRIL-VA-0318 CMCNF-0318 Statement of Variability.pdf
Previous Version	

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Satisfied - Item:	*Statements of Variability*
Comments:	
Attachment(s):	*CMCRIL-VA-0318 CMCNF-0318 Statement of Variability.pdf* *CRIL-VA-0318 CCNF-VA-0318 Statement of Variability.pdf*

Satisfied - Item:	Current Rate Tables
Comments:	
Attachment(s):	VA_MedAmerica_Current Rate Tables_515 Series_20180830.pdf
Previous Version	
Satisfied - Item:	*Current Rate Tables*
Comments:	
Attachment(s):	*VA_CICA_Current Rate Tables_515 Series_20180502.pdf*

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Filer

Created By:

Bill Dismore on 09/01/2020 02:40 PM

Last Edited By:

Bill Dismore

Submitted On:

09/03/2020 02:37 PM

Subject:

Please respond to the outstanding objection.

Comments:

This filing is ready for approval. The policyholder letter and forms received approval today, 9/3/2020.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Reviewer

Created By:

Cassi Noel on 08/31/2020 01:38 PM

Last Edited By:

Courtney Williamson

Submitted On:

08/31/2020 03:02 PM

Subject:

Extension Request for 7/23/2020 Objection Letter

Comments:

The July 23, 2020 objection requests a response once we receive notification from the Bureau that the policyholder notification forms filed under SERFF #MILL-131285847 are ready for approval. We have not yet received notification from the Bureau, therefore, we respectfully request an extension for the July 23, 2020 objection letter. Our proposed due date is September 30, 2020. Please let us know if the Bureau is willing to grant us this extension.

Thank you for your assistance with this filing.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Reviewer

Created By:

Cassi Noel on 03/13/2020 01:48 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:32 AM

Subject:

Updated Contact Information

Comments:

Please note that due to a changing in staffing, we would like to update the company contact of this filing to Courtney Williamson. Her contact information is provided below. Please let us know if you have any questions.

Courtney Williamson, ASA, MAAA
Associate Actuary
Milliman, Inc.
8500 Normandale Lake Blvd., Suite 1850
Minneapolis, MN 55437
(952) 820-2413
courtney.williamson@milliman.com

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Filer

Created By:

Bill Dismore on 03/04/2020 12:34 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:32 AM

Subject:

Status Update

Comments:

The policyholder letter and related forms filed under MILL-131285847 have been sent to the BOI Management for review. It is currently in their queue. The rate review has been completed and approval is contingent upon the policyholder letter approval.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Reviewer

Created By:

Cassi Noel on 03/04/2020 09:59 AM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:32 AM

Subject:

Status Update

Comments:

We respectfully request a status update on this filing. Thank you.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Filer

Created By:

Bill Dismore on 11/22/2019 12:42 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:32 AM

Subject:

Extension Request for 11/19/2019

Comments:

Extension request granted for 12/10/2019.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Reviewer

Created By:

Michael Emmert on 11/21/2019 02:40 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:32 AM

Subject:

Extension Request for 11/19/2019 Objection Letter

Comments:

We respectfully request an extension for the November 19, 2019 objection letter. Our proposed due date is December 10, 2019. Please let us know if the Bureau is willing to grant us this extension.

Thank you for your assistance with this filing.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Filer

Created By:

Elsie Andy on 06/13/2019 12:53 PM

Last Edited By:

Bill Dismore

Submitted On:

01/03/2020 12:08 PM

Subject:

Forms Withdrawn

Comments:

MedAmerica Insurance Company
SERFF Tracking No: MILL-131333141
Form Nos.: CMRIL-VA-0318, et al.

Per your request, we have withdrawn the forms in this submission from further consideration at this time. Should you need clarification of the information contained in this letter, please contact the undersigned.

Sincerely,
Elsie Andy
Manager, Forms and Rates
Life and Health Division

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Filer

Created By:

Bill Dismore on 07/20/2018 12:24 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:32 AM

Subject:

Policy Forms under 2 Different Companies (NAIC #'s)

Comments:

Per our telephone conversation of today, because the forms are filed on both MedAmerica and Combined Insurance paper there are two options available. (1) File the Rate Revision as two separate filings or (2) File as one filing but clearly separate the MedAmerica and Combined rate information specific to each Company.

Although a separate filing is required for each company, the experience of the policy form(s) can be combined. Experience and projection exhibits should be provided in total and separately for those with and without inflation option(s). They should be limited to the policy and rider forms applicable in Virginia. Do not include other forms for which there are not any Virginia policyholders.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Filer

Created By:

Bill Dismore on 07/11/2018 03:06 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:32 AM

Subject:

Status Update

Comments:

While we hope to review your filing shortly, we remain in a significant backlog and the filing has not been reviewed. This filing has not been reviewed and it is our intent to complete an initial review as soon as reasonably possible.

Thank you for your patience.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Note To Reviewer

Created By:

Michael Emmert on 07/11/2018 02:35 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:32 AM

Subject:

Status Update

Comments:

We respectfully request a status update on this filing. Thank you.

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Reviewer Note

Created By:

Bill Dismore on 01/03/2020 12:08 PM

Last Edited By:

Bill Dismore

Submitted On:

01/03/2020 12:08 PM

Subject:

Actuarial Review - Final Summary Report

Comments:

6/11/2019 - Received revised final report from Shawn Parks.

ACTUARIAL RESOURCES CORPORATION
CONSULTANTS • ACTUARIES
SHAWN D. PARKS, FSA, MAAA
1114 CATAWBA RIVER RD • GREAT FALLS, SC 29055
(803) 994 - 9895 • SHAWN.PARKS@ARCGA.COM

June 11, 2019

Life and Health Division
Bureau of Insurance
State Corporation Commission
P. O. Box 1157
Richmond, VA 23218

Subject: **Long Term Care Rate Increase Report**
SERFF Tracking #MILL-131333141

At the request of the Virginia SCC Bureau of Insurance (the "Bureau"), I have reviewed the filing for the above captioned submission from **MedAmerica Insurance Company** (the "Company"). This is a filing of revised premium rates for a block of Individual Long Term Care Insurance plans.

Recommendation

My review of this filing was performed according to the provisions of 14VAC5-200-153. Applicable Actuarial Standards of Practice were considered, including Actuarial Standard of Practice No. 18, "Long-Term Care Insurance" and Actuarial Standard of Practice No. 8, "Regulatory Filings for Rates and Financial Projections for Health Plans". After review of the Company's submission, I believe that the Company has failed to demonstrate that the full amount of their requested increase is in compliance with all applicable regulations. I therefore recommend that the Bureau work with the Company to reduce its request as detailed in the Conclusions section.

Background

This filing is linked to MILL-131588701 for sister company Combined Ins Co. of America. The Company submitted a request for a rate increase "to help alleviate the poor performance on this block of business." The requested increase is 130% for policies with inflation protection and 0% on policies without inflation. This policy form was issued in Virginia from April 1999 through October 2006 and, as of 12/31/2016, there were 88 policyholders in force with $100k of annualized premium. 73 of those policies are pre-stability and 15 post-stability. There have been no prior rate increases in Virginia.

Analysis

Assumptions

The assumptions used in the filing are considered "most likely" and do not reflect moderately adverse conditions.

The Company reports that the average valuation interest rate is 4.5% for pre-stability and 4.2% for post-stability policies. The Company's projections actually utilize the seriatim rate for each policy to discount the projections, which is consistent with the requirements of 14VAC5-200. The Company originally priced with an interest rate of 6.0%.

For mortality, the Company used the 1994 GAM Static table (which is 93% of the 94 GAM Basic) improved to 2016 (referred to as "2015GAM" in the Company's documents, with one additional year of improvement) with selection factors grading from 25% to 105%. The original assumptions were based on the 1983 GAM Table without selection or improvement.

The lapse rates vary by duration, with the duration 11+ assumption of 1.5% to 2.0%. Original assumptions had an ultimate rate of 4.0% in years 20+. In addition, the Company assumes CBUL election of 5%-10% (modeled as shock lapse) and reduced benefits for 12.5%-17.5% of the policies. Separate assumptions were used for benefit expiry.

The morbidity assumption is based on the 2014 Milliman LTCGs with Company adjustments to reflect historical claims experience. The original assumptions were based on the 1997 Milliman LTCGs. In addition, an increase in morbidity for adverse selection of 3.0%-5.0% is assumed. The overall A/E for morbidity is 102%. There have been 304 historical claims for policies with inflation protection.

Both the morbidity and mortality include 15 years of improvement. These typically offset each other in terms of the impact on loss ratio.

Loss Ratio Testing

The results below show the results of the test required by 14VAC5-200-150 and 153. Since CBUL is triggered with this increase, the 58% must be replaced with the original loss ratio if higher. Since no increase is being requested for policies without inflation protection, I have not shown them in this analysis.

Pre/Post Stability	Inflation	Test	Required Claims	Projected Claims	Pass/Fail
Pre	Auto	68/80	84.4	120.3	PASS
Post	Auto	66/85	11.1	13.7	PASS

Pre/Post Stability	Inflation	Original LR	No Increase Future	No Increase Fut/ALR	No Increase Lifetime	With Increase Future	With Increase Fut/ALR	With Increase Lifetime	From Inception
Pre	Auto	68%	453%	122%	104%	231%	65%	90%	47%
Post	Auto	66%	298%	48%	104%	148%	27%	80%	47%

There is a minor issue with the future loss ratio for Pre-Stability, but this ratio is not extremely low (65%) and is likely due to a mismatch between statutory reserve assumptions and projection assumptions. The Post-Stability, however, are in violation of this test even without any rate increase.

One alternative measure of testing for reasonableness of the premiums and to avoid recouping of past losses is to assess the lifetime loss ratio assuming the requested rates had been in effect from inception of the policy, which is shown in the "From Inception" column above. I will note that this measure is very restrictive and assumes the Company to have perfect knowledge from the outset. Also, this measure is a benchmark which is not required by Virginia regulations.

PV of Future Losses

The goal of this test is to ensure that, when looking only into the future, the company is not in a better position financially than if the assumptions were to play out according to original assumptions (except for interest and mix). This is done by calculating the present value of the future expected loss under original assumptions and comparing that to the current assumptions with and without the proposed premium action. For this filing, the results show that the expected loss with the requested increase is slightly less than that expected under original assumptions. The allowable increase is also shown based on this test.

Pre/Post Stability	Inflation	Original	Current	Proposed	Limit
Pre	Auto	-51.7	-69.7	-51.6	129%
Post	Auto	-4.6	-8.0	-4.0	109%

State Rate Equity

The current weighted average rate increase in all other states is 37% (range 0% to 130%) for Form 515. In those states which have reached a resolution on the current round of increases (which represent 52% of the nationwide premium), the average is 49%. If all pending requests are approved for the full amount, the nationwide average would be 90%. Virginia has not approved any prior increases, and the current request is 130%. While the Bureau typically does not use this measure on a first increase, given the magnitude of the request, the Bureau may wish to give it some consideration.

Texas Approach

Pre/Post Stability	Inflation	PV Fut Claims Original	PV Fut Claims Revised	PV Future Prem Original	PV Future Prem Revised	Allowed
Pre	Auto	30.1	89.5	19.8	19.8	375%
Post	Auto	4.2	12.0	4.0	4.0	228%

Conclusions

Based on a combination of:

- ***future loss ratio results,***
- ***present value of future loss results, and***
- ***state rate equity issues,***

I recommend approval of the full 130% rate increase for Pre-Stability policies with auto inflation, but denial of the increase for Post-Stability policies with auto inflation.

Reliance and Qualifications

I am providing this letter to the Bureau as the sole intended user. The scope of the review relates only to compliance with applicable laws and regulations relating to the actuarial aspects of the filing under consideration, and the intended purpose is to communicate my findings regarding this filing. Distribution of this letter to parties other than the Bureau by me or any other party does not constitute advice by me to those parties. The reliance of parties other than the Bureau on any aspect of this work is not authorized by me and is done at their own risk.

In arriving at my opinion, I used and relied on information provided by the Company and the Bureau without independent investigation or verification. If this information is inaccurate, incomplete, or out of date, my findings and conclusions may need to be revised. While I have relied on the data provided without independent investigation or verification, I have reviewed the data for consistency and reasonableness. In the event that I found the data inconsistent or unreasonable, I have requested clarification.

I am a member of the American Academy of Actuaries and meet that body's Qualification Standards to render this opinion. I am responsible for this work and have utilized generally accepted actuarial methodologies in arriving at my opinion.

If you have any questions regarding this filing, please contact me to discuss.

Sincerely,

Shawn D. Parks, FSA, MAAA

State:	*Virginia*	**Filing Company:**	*MedAmerica Insurance Company*
TOI/Sub-TOI:	*LTC03I Individual Long Term Care/LTC03I.001 Qualified*		
Product Name:	*Long-Term Care*		
Project Name/Number:	*CICA LTC Rate Increase Filing/145MAI01-40.03*		

Reviewer Note

Created By:

Bill Dismore on 09/21/2018 02:08 PM

Last Edited By:

Bill Dismore

Submitted On:

09/03/2020 02:48 PM

Subject:

RRS

Comments:

Rate Review Summary

Reset Form

Health Insurance Rate Request Summary
Part 1 – To Be Completed By Company

Company Name and NAIC Number: MedAmerica Insurance Company - NAIC # 69515

SERFF Tracking Number: MILL-131333141

Effective Date: This rate increase will apply to policies on their next premium payment date following at least a 75-day policyholder notification period following approval.

(Projected) Number of Insureds Affected: 147

New Rates

Average Annual Premium Per Member: N/A

Revised Rates

Average Annual Premium Per Member: 1,077

Average Requested Percentage Rate Change Per Member: 68%

Minimum Requested Percentage Rate Change Per Member: 0%

Maximum Requested Percentage Rate Change Per Member: 130%

Plans Affected
(The Form Number and "Product Name")

Form#	"Product Name"(if applicable)
14515-VA	Tax-Qualified Long-Term Care Policy Form
14531	Home Health Care Rider
14532	Inflation Protection Rider
14533	Non-Forfeiture Rider

Attach a brief narrative to summarize the key information used to develop the rates including the main drivers for new or revised rates.

This document is intended to help explain the rate filing and it is only a summary of the company's request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.

Health Insurance Rate Request Summary
Summary of Key Information

Rates are increasing based on the fact that people are living longer and keeping their policies for a longer time than expected. This means we, as the company, expect to pay more claims in the future. New data on the company and industry-wide claim costs show that those costs are higher than originally expected when the product was priced.

Long Term Care Insurance Rate Request Summary
Part 2 –To Be Completed by Bureau of Insurance

Company Name and NAIC Number: MedAmerica Insurance Company - 69515

SERFF Tracking Number: MILL-131333141

Disposition: Approved

Approval Date: 9/04/2020

Revised Rates

Average Annual Premium Per Member: $1,077

Average Requested Percentage Rate Change Per Member: 68.0%

Minimum Requested Percentage Rate Change Per Member: 0.0%

Maximum Requested Percentage Rate Change Per Member: 130.0%

Number of Policy Holders Affected: 147

Summary of the Bureau of Insurance's review of the rate request:

The Company requested, and the Bureau approved a rate increase of 68% (0% for policies without inflation protection, 130% for policies with inflation protection) for this block of individual long-term care insurance policy forms.

The filing was reviewed by the Bureau's consulting actuary and determined to comply with the requirements for a rate increase set forth in 14VAC5-200-150 and 14VAC5-200-153 of the Virginia Administrative Code for policies issued prior to, on and after October 1,2003. The review indicated that the anticipated loss ratio, reflecting claims payout, will be 90% with the increase for policies issued prior to 10/01/2003 and 80% for policies issued 10/01/2003 and later. Both anticipated loss ratios exceed the minimum required loss ratio of 60%.

The Company has advised that they reserve the right to request a future rate increase on this block but this must be filed with, reviewed and approved by the Virginia Bureau of Insurance.

The primary reasons for the rate increase are that policyholders are living longer and keeping their policies in force longer, which has resulted in more claims being filed than the Company anticipated when the policy was originally priced. The Company determined that a premium increase is necessary to reflect that future claims are expected to be significantly higher on these policies than originally expected or priced and to ensure that sufficient funds are available to pay claims.

The Company is offering all policyholders options to reduce the premium increase by reducing their coverage. These reductions could be in the form of lower daily benefits, a shorter benefit period, a longer elimination period, the termination of riders or any combination of these reductions, or a paid-up policy. Specific options are included in the letter sent to all policyholders notifying them of the rate increase and can be discussed with the Company by calling its customer service department.

The filing can be reviewed on the Bureau's webpage under the Rate/Policy Form Search at:
https://scc.virginia.gov/boi/SERFFInquiry/LtcFilings.aspx

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Post Submission Update Request Processed On 01/17/2019

Status:	Allowed
Created By:	Cassi Noel
Processed By:	Bill Dismore
Comments:	

Company Rate Information:

Company Name:MedAmerica Insurance Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	82.100%	130.000%
Overall % Rate Impact	82.100%	130.000%
Number of Policy Holders Affected for this Program	147	88
Written Premium for this Program	$158306	$99998
Minimum %Change (where required)	0.000%	130.000%

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Post Submission Update Request Processed On 09/04/2018

Status:	Allowed
Created By:	Dexter Mosley
Processed By:	Bill Dismore
Comments:	Company removed Continental General plans from MedAmerica filing as requested in Filing Notes

Company Rate Information:

Company Name:MedAmerica Insurance Company

Field Name	Requested Change	Prior Value
Written Premium Change for this Program	$129998	$161087
Number of Policy Holders Affected for this Program	88	107
Written Premium for this Program	$99998	$123913

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Form Schedule

Lead Form Number:

Item No.	Schedule Item Status	Form Name	Form Number	Form Type	Form Action	Action Specific Data	Readability Score	Attachments
1	Withdrawn 06/25/2020	Notice of Premium Increase		OTH	Other	Form moved to filing under SERFF tracking #MILL-131285847.		
2	Withdrawn 06/25/2020	Notice of Premium Increase		OTH	Other	Form moved to concurrent filing under SERFF tracking #MILL-131588701.		
3	Withdrawn 06/25/2020	Contingent Non-Forfeiture Benefit Election Form		OTH	Other	Form moved to filing under SERFF tracking #MILL-131285847.		
4	Withdrawn 06/25/2020	Contingent Non-Forfeiture Benefit Election Form		OTH	Other	Form moved to concurrent filing under SERFF tracking #MILL-131588701.		

Form Type Legend:

ADV	Advertising	**AEF**	Application/Enrollment Form
CER	Certificate	**CERA**	Certificate Amendment, Insert Page, Endorsement or Rider
DDP	Data/Declaration Pages	**FND**	Funding Agreement (Annuity, Individual and Group)
MTX	Matrix	**NAP**	Network Access Plan
NOC	Notice of Coverage	**OTH**	Other
OUT	Outline of Coverage	**PJK**	Policy Jacket
POL	Policy/Contract/Fraternal Certificate	**POLA**	Policy/Contract/Fraternal Certificate: Amendment, Insert Page, Endorsement or Rider
PRC	Provider Contract/Provider Addendum/Provider Leading Agreement	**PRD**	Provider Directory

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Rate Information

Rate data applies to filing.

Filing Method: Review and Approval
Rate Change Type: Increase
Overall Percentage of Last Rate Revision: %
Effective Date of Last Rate Revision:
Filing Method of Last Filing:
SERFF Tracking Number of Last Filing:

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):
MedAmerica Insurance Company	68.000%	68.000%	$108,033	147	$158,306	130.000%	0.000%

State: *Virginia* **Filing Company:** *MedAmerica Insurance Company*
TOI/Sub-TOI: *LTC03I Individual Long Term Care/LTC03I.001 Qualified*
Product Name: *Long-Term Care*
Project Name/Number: *CICA LTC Rate Increase Filing/145MAI01-40.03*

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		Rate Tables	14515-VA	Revised	Previous State Filing Number: This form and all associated riders were originally approved in 1998. Percent Rate Change Request: 68	VA_CICA-MedAmerica_Proposed_Rate Tables_515 Series_20191025.pdf,
2		Rate Tables	14531	Other	Previous State Filing Number: This form and all associated riders were originally approved in 1998. Rate Action Other Explanation: The rider premium factors for 14531 are not being revised as part of this rate increase request. The base rates are increasing by 130% so the corresponding premium dollars for this rider will also increase by 130%.	
3		Rate Tables	14532	Other	Previous State Filing Number: This form and all associated riders were originally approved in 1998. Rate Action Other Explanation: The rider premium factors for 14532 are not being revised as part of this rate increase request. The base rates are increasing by 130% so the corresponding premium dollars for this rider will also increase by 130%.	
4		Rate Tables	14533	Other	Previous State Filing Number: This form and all associated riders were originally approved in 1998. Rate Action Other Explanation: The rider premium factors for 14533 are not being revised as part of this rate increase request. The base rates are increasing by 130% so the corresponding premium dollars for this rider will also increase by 130%.	

MEDAMERICA INSURANCE COMPANY

RATE SHEET FOR POLICY FORM 14515 WITH COMPOUND INFLATION

PROPOSED ANNUAL PREMIUMS (Per $10 of Benefit) WITH 130% INCREASE FOR POLICIES ISSUED PRIOR TO OCTOBER 1, 2003

	Lifetime Multiplier = 400			**Lifetime Multiplier = 800**			**Lifetime Multiplier = 1200**			**Lifetime Multiplier = 1600**			**Lifetime Multiplier = Unlimited**		
Issue	*Elimination Period*			*Elimination Period*			*Elimination Period*			*Elimination Period*			*Elimination Period*		
Age	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*
18-44	$57	$53	$48	$77	$67	$62	$86	$77	$72	$91	$81	$77	$124	$110	$100
45-49	$78	$69	$64	$106	$92	$87	$120	$106	$97	$133	$115	$106	$193	$166	$152
50	$85	$76	$71	$116	$103	$94	$138	$120	$112	$156	$134	$125	$223	$192	$178
51	$88	$79	$71	$119	$106	$97	$146	$128	$115	$163	$141	$128	$234	$203	$185
52	$92	$79	$74	$127	$109	$101	$153	$131	$118	$170	$149	$135	$245	$214	$192
53	$96	$83	$78	$135	$113	$104	$161	$139	$126	$183	$156	$143	$256	$226	$204
54	$99	$86	$78	$138	$121	$108	$169	$147	$134	$190	$164	$151	$272	$233	$216
55	$103	$90	$82	$146	$129	$116	$181	$155	$138	$202	$172	$159	$284	$249	$224
56	$107	$94	$86	$158	$133	$120	$193	$163	$150	$214	$184	$167	$304	$261	$240
57	$111	$98	$89	$170	$145	$128	$204	$174	$157	$230	$196	$179	$323	$281	$255
58	$123	$106	$93	$182	$157	$140	$220	$190	$174	$250	$212	$195	$347	$300	$275
59	$130	$109	$101	$198	$168	$152	$240	$206	$185	$269	$231	$210	$375	$324	$295
60	$142	$121	$109	$213	$184	$163	$260	$222	$201	$293	$251	$226	$406	$352	$318
61	$150	$129	$117	$229	$196	$179	$279	$241	$216	$316	$271	$246	$437	$379	$346
62	$161	$137	$124	$248	$211	$190	$302	$261	$232	$335	$290	$265	$468	$406	$368
63	$172	$147	$131	$262	$221	$201	$315	$274	$246	$356	$307	$278	$491	$426	$385
64	$182	$154	$142	$271	$231	$206	$328	$283	$255	$368	$320	$287	$510	$441	$401
65	$192	$164	$148	$280	$240	$216	$344	$296	$268	$384	$332	$300	$528	$460	$416
66	$202	$174	$158	$297	$257	$229	$364	$313	$281	$407	$352	$320	$558	$483	$439
67	$219	$192	$172	$321	$274	$246	$391	$336	$305	$442	$379	$344	$602	$520	$473
68	$240	$205	$189	$352	$301	$270	$429	$371	$332	$483	$417	$375	$657	$568	$514
69	$260	$225	$202	$386	$332	$298	$473	$409	$367	$531	$458	$412	$718	$622	$565
70	$283	$245	$223	$426	$366	$328	$521	$449	$404	$585	$505	$456	$792	$683	$619
71	$309	$268	$242	$469	$402	$361	$574	$496	$447	$645	$555	$503	$872	$753	$682
72	$342	$294	$265	$519	$445	$401	$637	$548	$493	$714	$615	$556	$960	$832	$751
73	$378	$327	$294	$574	$491	$440	$701	$607	$545	$789	$680	$614	$1,057	$916	$829
74	$416	$359	$327	$631	$542	$484	$771	$667	$599	$868	$750	$678	$1,166	$1,008	$911
75	$460	$397	$358	$691	$592	$531	$850	$733	$659	$956	$822	$744	$1,279	$1,105	$999
76	$507	$437	$395	$759	$650	$584	$930	$804	$724	$1,045	$902	$815	$1,398	$1,210	$1,094
77	$555	$480	$435	$828	$711	$642	$1,018	$880	$790	$1,145	$987	$894	$1,528	$1,321	$1,194
78	$609	$524	$473	$909	$780	$705	$1,113	$963	$865	$1,253	$1,082	$977	$1,668	$1,443	$1,304
79	$668	$574	$520	$994	$856	$772	$1,219	$1,051	$944	$1,373	$1,185	$1,071	$1,827	$1,578	$1,424
80	$729	$626	$566	$1,080	$934	$845	$1,325	$1,143	$1,027	$1,494	$1,288	$1,163	$1,984	$1,716	$1,547
81	$787	$676	$611	$1,166	$1,009	$914	$1,427	$1,235	$1,107	$1,610	$1,388	$1,254	$2,133	$1,842	$1,662
82	$840	$721	$650	$1,246	$1,079	$976	$1,523	$1,314	$1,179	$1,713	$1,478	$1,333	$2,260	$1,951	$1,761
83	$898	$770	$694	$1,330	$1,154	$1,042	$1,621	$1,397	$1,256	$1,819	$1,570	$1,416	$2,391	$2,065	$1,857
84	$955	$819	$736	$1,416	$1,225	$1,105	$1,714	$1,482	$1,333	$1,920	$1,657	$1,495	$2,514	$2,168	$1,952
85+	$1,276	$1,082	$960	$1,864	$1,595	$1,420	$2,211	$1,899	$1,699	$2,440	$2,096	$1,880	$3,040	$2,596	$2,321

MEDAMERICA INSURANCE COMPANY

RATE SHEET FOR POLICY FORM 14515 WITH COMPOUND INFLATION

PROPOSED ANNUAL PREMIUMS (Per $10 of Benefit) WITH 0% INCREASE FOR POLICIES ISSUED ON OR AFTER OCTOBER 1, 2003

	Lifetime Multiplier = 400			**Lifetime Multiplier = 800**			**Lifetime Multiplier = 1200**			**Lifetime Multiplier = 1600**			**Lifetime Multiplier = Unlimited**		
Issue	*Elimination Period*			*Elimination Period*			*Elimination Period*			*Elimination Period*			*Elimination Period*		
Age	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*
18-44	$25	$23	$21	$33	$29	$27	$37	$33	$31	$40	$35	$33	$54	$48	$44
45-49	$34	$30	$28	$46	$40	$38	$52	$46	$42	$58	$50	$46	$84	$72	$66
50	$37	$33	$31	$50	$45	$41	$60	$52	$49	$68	$58	$54	$97	$83	$78
51	$38	$35	$31	$52	$46	$42	$63	$56	$50	$71	$61	$56	$102	$88	$81
52	$40	$34	$32	$55	$48	$44	$67	$57	$51	$74	$65	$59	$106	$93	$84
53	$42	$36	$34	$59	$49	$45	$70	$60	$55	$79	$68	$62	$112	$98	$89
54	$43	$38	$34	$60	$53	$47	$73	$64	$58	$83	$71	$66	$118	$102	$94
55	$45	$39	$36	$64	$56	$50	$79	$67	$60	$88	$75	$69	$123	$108	$97
56	$47	$41	$37	$69	$58	$52	$84	$71	$65	$93	$80	$73	$132	$113	$104
57	$48	$43	$39	$74	$63	$56	$89	$76	$68	$100	$85	$78	$141	$122	$111
58	$53	$46	$40	$79	$68	$61	$96	$83	$75	$109	$92	$85	$151	$131	$120
59	$57	$48	$44	$86	$73	$66	$104	$90	$81	$117	$101	$92	$163	$141	$128
60	$62	$53	$47	$93	$80	$71	$113	$96	$87	$127	$109	$98	$177	$153	$138
61	$65	$56	$51	$100	$85	$78	$121	$105	$94	$138	$118	$107	$190	$165	$150
62	$70	$59	$54	$108	$92	$83	$131	$113	$101	$146	$126	$115	$203	$176	$160
63	$75	$64	$57	$114	$96	$87	$137	$119	$107	$155	$134	$121	$214	$185	$167
64	$79	$67	$62	$118	$100	$90	$143	$123	$111	$160	$139	$125	$222	$192	$174
65	$84	$71	$64	$122	$104	$94	$150	$129	$117	$167	$144	$131	$230	$200	$181
66	$88	$76	$69	$129	$112	$100	$158	$136	$122	$177	$153	$139	$243	$210	$191
67	$95	$83	$75	$139	$119	$107	$170	$146	$133	$192	$165	$150	$262	$226	$206
68	$104	$89	$82	$153	$131	$118	$186	$161	$144	$210	$181	$163	$286	$247	$223
69	$113	$98	$88	$168	$144	$129	$206	$178	$159	$231	$199	$179	$312	$271	$246
70	$123	$107	$97	$185	$159	$143	$226	$195	$175	$254	$220	$198	$344	$297	$269
71	$134	$117	$105	$204	$175	$157	$249	$215	$194	$280	$241	$219	$379	$327	$296
72	$149	$128	$115	$226	$194	$174	$277	$238	$214	$310	$267	$242	$418	$362	$326
73	$164	$142	$128	$250	$213	$191	$305	$264	$237	$343	$295	$267	$460	$398	$360
74	$181	$156	$142	$275	$236	$211	$335	$290	$261	$378	$326	$295	$507	$438	$396
75	$200	$172	$156	$300	$257	$231	$370	$319	$286	$416	$357	$323	$556	$480	$434
76	$220	$190	$172	$330	$283	$254	$404	$350	$315	$454	$392	$354	$608	$526	$476
77	$242	$209	$189	$360	$309	$279	$443	$383	$344	$498	$429	$389	$665	$575	$519
78	$265	$228	$206	$395	$339	$306	$484	$419	$376	$545	$471	$425	$725	$628	$567
79	$291	$250	$226	$432	$372	$336	$530	$457	$410	$597	$515	$466	$794	$686	$619
80	$317	$272	$246	$469	$406	$367	$576	$497	$446	$649	$560	$505	$863	$746	$672
81	$342	$294	$266	$507	$439	$398	$621	$537	$481	$700	$604	$545	$927	$801	$723
82	$365	$314	$283	$542	$469	$424	$662	$571	$512	$745	$643	$580	$983	$848	$766
83	$391	$335	$302	$578	$502	$453	$705	$607	$546	$791	$682	$616	$1,040	$898	$808
84	$415	$356	$320	$615	$533	$480	$745	$644	$580	$835	$720	$650	$1,093	$943	$849
85+	$555	$471	$418	$811	$694	$617	$962	$826	$738	$1,061	$911	$817	$1,322	$1,129	$1,009

State: Virginia **Filing Company:** MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Supporting Document Schedules

Bypassed - Item:	Certification of Compliance
Bypass Reason:	Not applicable as this filing no longer includes the filing of forms. The forms have been moved to filing under SERFF tracking #MILL-131285847.
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Product Checklist
Comments:	
Attachment(s):	VA_Rate Review Requirements Checklist_20180830.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA_Supplement_MedAmerica_LRRS_20180830.pdf VA_ActMemo_MedAmerica_LRRS_20191112.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA_Rate Request Summary_MedAmerica_20191210.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Bypassed - Item:	L&H Readability - Health
Bypass Reason:	Not applicable as this filing no longer includes the filing of forms. The forms have been moved to filing under SERFF tracking #MILL-131285847.
Attachment(s):	
Item Status:	Withdrawn
Status Date:	06/13/2019

Satisfied - Item:	Cover Letter
Comments:	

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Attachment(s):	VA_Cover Letter_MedAmerica_LRRS_20190129.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Letters of Authorization
Comments:	
Attachment(s):	Authorization to file MedAmerica 20180111.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Statement of Variability
Comments:	This Statement of Variability is provided for informational purposes. This Statement of Variability is being filed under SERFF tracking number MILL-131285847.
Attachment(s):	Statement of Variability CICA Assumed Product Line 12.10.19.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Current Rate Tables
Comments:	
Attachment(s):	VA_CICA-MedAmerica_Current_Rate Tables_515 Series_20191025.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Response to July 20, 2018 Note to Filer
Comments:	
Attachment(s):	VA_Response to 20180720 Note to Filer_MedAmerica_20180830.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Response to September 4, 2018 Objection Letter
Comments:	
Attachment(s):	VA CICA-MedAmerica Response_20180907 Objection Letter_20180904.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Response to September 10, 2018 Objection
Comments:	

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Attachment(s):	VA CICA-MedAmerica Response_20180921 Objection Letter_20180910.pdf MedAmerica VA_Summary of Benefits Amendment.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Claims and Administration Processing Plan
Comments:	
Attachment(s):	MedAmerica Claims Procedures_20160128.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Response to October 9, 2018 Objection
Comments:	
Attachment(s):	VA_Response to 20181009 Objection_MedAmerica_20181112.pdf Approaches to LTC Rate Increases 09-27-18_ProspectivePV.pdf VA_Response Attachments_MedAmerica_LRRS_20181112.xlsb
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Response to November 30, 2018 Objection
Comments:	
Attachment(s):	VA CICA-MedAmerica Response_20181204 Objection Letter_20181130.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Response to January 9, 2019 Objection
Comments:	
Attachment(s):	VA_Response to 20190109 Objection_MedAmerica_20190116.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Response to January 17, 2019 Objection
Comments:	
Attachment(s):	VA_Response to 20190117 Objection_MedAmerica_20190129.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Response to October 2, 2019 Objection

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Comments:	
Attachment(s):	VA CICA-MedAmerica Response_20191025 Objection Letter_20191002.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Response to November 19, 2019 Objection
Comments:	
Attachment(s):	VA CICA-MedAmerica Response_20191210 Objection Letter_20191119.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

Satisfied - Item:	Copy of Original Policy Form
Comments:	
Attachment(s):	14515-VA Approved Policy Form.pdf
Item Status:	Received & Acknowledged
Status Date:	09/03/2020

State: Virginia
Filing Company: MedAmerica Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long-Term Care
Project Name/Number: CICA LTC Rate Increase Filing/145MAI01-40.03

Attachment VA_Response Attachments_MedAmerica_LRRS_20181112.xlsb is not a PDF document and cannot be reproduced here.

Rate Review Requirements Checklist
For all Rate Filings for Forms Issued in the Individual and Small Group Markets, Hospital Confinement Indemnity, Disability Income Protection, Accident Only, Specified Disease and Other, whether paid on an expense incurred or indemnity basis, and Medicare Supplement

NOTE: This document is intended to assist carriers in preparing rate filings for individual and selected group accident and sickness insurance coverage for approval by the Bureau of Insurance. It provides guidance based on current Virginia laws and regulations. It should be noted, however, that this checklist should not be used exclusive of other important resources, including, but not limited to, any and all other applicable state insurance laws and associated rules and regulations. It is the responsibility of the carriers to verify that their products comply with all relevant statutory and regulatory requirements. Note that some regulatory references in the comments column are approximate. Please review the applicable Administrative Code for the full text of the regulation.

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
General Filing Requirements				
Information about the filing	14 VAC 5-100-70	When submitting an Individual Accident and Sickness form, a company must file the applicable rates, rules and classification of risks with the Commission.	Cover Letter	
Company Name and NAIC No.	Administrative Letter 1983-7	The transmittal letter must include the name and NAIC number of the company for which the filing is made.	Cover Letter	
Additional SERFF Filing Requirements	***Administrative Letter 2012-03***	***Additional SERFF filing requirements must be met as specified below for health insurance rate filings. Failure to provide the applicable information will result in a "REJECTED" filing.***		
General Information Filing Description		All submissions must provide a brief summary of the filing, including a statement describing whether the rate or rate manual is new or a revision of an existing rate or rate manual.	Cover Letter	
		Identification of SERFF or state tracking number for the previously approved rate or rate manual.	SERFF Rate/Rule Schedule tab	
HELP TIP:		If a form or rate filing is submitted as new in Virginia, but was previously disapproved or withdrawn in Virginia, please provide details such as the tracking information, form number, and the date that the form or rate filing was disapproved or withdrawn, if available.		
Rate Changes		(i) Include a statement regarding an increase, decrease, revision of former rates. (ii) Specify the percentage amount(s) of the change(s). (iii) Specify the number of affected policyholders. (iv) Specify the reason for the proposed change(s).	(i) Cover Letter (ii) Cover Letter (iii) Actuarial Memorandum (AM) Sections 19 & 22 (iv) AM Sections 17 & 18	

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
	14 VAC 5-130-50 B	Include an actuarial memorandum describing the basis on which rates were determined including a description of the calculation of the anticipated loss ratio.	AM Sections 5, 14, 15, & 18	
Individual and Small Group Markets – Age Curve	14 VAC 5-130- 50 E 1; Virginia Rate Template	Premium rates with respect to a particular plan or coverage may only vary by: (a) Whether the plan or coverage covers an individual or family; (b) The rating area; (c) Age, consistent with the Federal Default Standard Age Curve; (d) Tobacco use, except the rate must not vary more than 1.5 to 1. If included in a small group form, employees must be given the option to avoid the tobacco surcharge by participating in certain wellness programs.		Not Applicable
	14 VAC 5-130-50 E 2	A premium rate must not vary by any other factor not described in 14 VAC 5-130-50 E 1.		Not Applicable
	14 VAC 5-130-50 E 3	For family coverage, permitted rating variations must be applied based on the portion of premium attributable to each family member covered under the plan. With respect to family members under age 21, the premiums for no more than the three oldest covered children must be taken into account in determining the total family premium.		Not Applicable
	14 VAC 5-130-50 E 4	The premium charged must not be adjusted more frequently than annually except that the premium rate may be changed to reflect changes to: (i) Family composition of the member or; (ii) Coverage requested by the member.		Not Applicable
	14 VAC 5-130-50 E 5	Premium rates for student health insurance coverage may be based on school-specific community rating and are exempt from subdivision 1 through 4 above.		Not Applicable
Accident and Sickness Insurance Rate Filing Requirements – Filing a Rate for a New Policy Form	14 VAC 5-130-60 A	New rate submission must include: (i) Form number of applicable policy or certificate, application, and endorsements; (ii) Rate Sheet(s); (iii) Unified Rate Review Template *(only for rates applicable in the individual and small group health insurance markets except for student health insurance coverage).*		Not Applicable

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
	14 VAC 5-130-60 B	An Actuarial Memorandum that includes:		
	14 VAC 5-130-60 B 1	A description of the type of policy or coverage, including benefits, renewability, general marketing method, and issue age limits.		Not Applicable
	14 VAC 5-130-60 B 2	A description of how rates were determined, including the general description and source of each assumption used.		Not Applicable
	14 VAC 5-130-60 B 3	The estimated average annual premium per policy and per member.		Not Applicable
	14 VAC 5-130-60 B 4	The anticipated loss ratio and a description of how it was calculated.		Not Applicable
	14 VAC 5-130-60 B 5	The minimum anticipated loss ratio presumed reasonable in accordance with 14 VAC 5-130-65.		Not Applicable
	14 VAC 5-130-60 B 6	If the anticipated loss ratio is less than the minimum anticipated loss ratio, include supporting documentation for the use of such premiums.		Not Applicable
	14 VAC 5-130-60 B 7	*For coverage issued in the Individual or Small Group Health Insurance Market:* A certification by a qualified actuary of the actuarial value of each plan of benefits included and the AV calculation summary.		Not Applicable
	14 VAC 5-130-60 B 8	A certification by a qualified actuary that, to the best of his or her knowledge and judgment, the rate filing is in compliance with the applicable laws and regulations of Virginia and the premiums are reasonable in relation to the benefits provided.		Not Applicable
Reasonableness of benefits in relation to initial premiums	14 VAC 5-130-65 A	Benefits are deemed reasonable in relation to premiums if the anticipated loss ratio of policy form, including riders and endorsements, is at least as great as specified in the table provided, taking into account the qualifications and adjustments in subdivisions 1 through 9 below. The below anticipated loss ratio standards do not apply to a class of business where such standards are in conflict with specific statutes or regulations.		Not Applicable

REVIEW REQUIREMENTS	REFERENCE	COMMENTS						LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
	14 VAC 5-130-65 A 1	If the expected average annual premium is at least $200 but less than $1,000.							
		Type of Coverage	Renewal Clause						
			OR	CR	GR	NC	Other		
		Hospital Indemnity	60%	55%	55%	50%	60%		
		Disability Income Protection, Accident Only, Specified Disease and Other, whether paid on an expense incurred or indemnity basis	60%	55%	50%	45%	60%		
	14 VAC 5-130-65 A 2	If the expected average annual premium is $100 or more but less than $200, subtract five percentage points from the numbers in the table.							Not Applicable
	14 VAC 5-130-65 A 3	If the expected average annual premium is less than $100, subtract 10 percentage points from the numbers in the table.							Not Applicable
	14 VAC 5-130-65 A 4	If the expected average annual premium is $1,000 or more, add five percentage points to the numbers in the table.							Not Applicable
	14 VAC 5-130-65 A 5	Group Medicare supplement policies are expected to return to policyholders in the form of aggregate benefits under the policy at least 75% of the aggregate amount of premiums collected.							Not Applicable

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
	14 VAC 5-130-65 A 6	Medicare supplement policies issued prior to July 30, 1992, as a result of solicitation of individuals through the mail or by mass media advertising, which shall include both print and broadcast advertising, are expected to return to policyholders in the form of aggregate benefits under the policy at least 60% of the aggregate amount of premiums collected.		Not Applicable
	14 VAC 5-130-65 A 7	Medicare supplement policies issued prior to July 30, 1992, sold on an individual rather than a group basis are expected to return to policyholders in the form of aggregate benefits under the policy at least 60% of the aggregate amount of premiums collected.		Not Applicable
	14 VAC 5-130-65 A 8	All health insurance coverage issued in the individual health insurance market shall be originally priced to meet a minimum 75% loss ratio and, except for student health insurance coverage, must be guaranteed renewable or noncancellable.		Not Applicable
	14 VAC 5-130-65 A 9	All health insurance coverage issued in the small group health insurance market must be originally priced to meet a minimum 75% loss ratio and must be guaranteed renewable or noncancellable.		Not Applicable
	14 VAC 5-130-65 B	The average annual premium per policy per member shall be computed by the health insurance issuer based on an anticipated distribution of business by all applicable criteria having a price difference, such as age, sex, amount, dependent status, rider frequency, etc., except assuming an annual mode for all policies *(i.e., the fractional premium loading shall not affect the average annual premium or anticipated loss ratio calculation).*		Not Applicable

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
All Accident and Sickness Forms; Subscriber Contracts of Hospital, Medical or Surgical Plans; Dental Plans; Optometric Plans; Health Insurance Coverage in the Individual and Small Group Markets; Individual and Group Medicare supplement forms and subscriber contracts of hospital, medical or surgical plans – Filing a Rate Revision	14 VAC 5-130-70 A	Rate revision submission must include: (i) New Rate Sheet; (ii) All information required by SERFF; and (iii) Unified Rate Review Template (individual and small group health insurance markets except for student health insurance coverage).	(i) SERFF Rate/Rule Schedule tab (ii) SERFF (iii) Not Applicable	
	14 VAC 5-130-70 B	**Actuarial Memorandum**		
	14 VAC 5-130-70 B 1	A description of the type of policy, including benefits, renewability, issue age limits, and if applicable, whether the policy includes grandfathered, non-grandfathered plans, or both.	AM Sections 2, 3, & 9	
	14 VAC 5-130-70 B 2	The scope and reason for the premium or rate revision.	AM Sections 17 & 18	
	14 VAC 5-130-70 B 3	A comparison of the revised premiums with the current premium scale, including all percentage rate changes and any rating factor changes.	Cover Letter & AM Section 18	
	14 VAC 5-130-70 B 4	A statement of whether the revision applies only to new business, only to in-force business, or to both.	AM Section 4	
	14 VAC 5-130-70 B 5	The estimated average annual premium per policy and per member, before and after the proposed rate revision. If different changes by rating classification are requested, the filing also must include: (i) Range of changes; and (ii) average overall change, including a detailed explanation of how the change was determined.	AM Section 19	
	14 VAC 5-130-70 B 6	*The following is applicable to all coverage with the exception of coverage issued in the small group market:* Submit Form 130-A showing historical and projected experience, including: (i) Projections for future experience, and Virginia and national historical experience of earned premiums, paid claims, incurred claims and loss from inception through	(i) Supplement to the Actuarial Memorandum (SAM) Section 3	Actual and projected experience are based on historical experience through December 31, 2016, which is the most recent data available.

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
		most recent quarter. Virginia and national experience should be shown separately. Missing experience should be estimated with all estimation assumptions and methodologies provided in detail; (ii) A statement of the basis for determining the rate revision (Virginia, national, or blended); and (iii) If blended, provide the credibility factor assigned to the national experience.	(ii) SAM Section 3 (iii) Not Applicable	
	14 VAC 5-130-70 B 7	Details and dates of all past rate revisions, including annual rate revisions members will experience resulting from this filing. If a company only revises rates annually, the rate revision must be identical to the current submission. If a company has had more frequent rate revisions, the annual revision must reflect the compounding impact of all revisions for the past 12 months.	AM Section 16	
	14 VAC 5-130-70 B 8	A description of how revised rates were determined, including the general description and source of each assumption of Form 130-A. For claims, provide historical and projected claims by major service category for both cost and utilization on Form 130-B.	AM Sections 5, 17, & 18	
	14 VAC 5-130-70 B 9	If the rate revision applies to new business, provide the anticipated loss ratio and a description of how it was calculated.		Not Applicable
	14 VAC 5-130-70 B 10	If the rate revision applies to in-force business provide: (a) The anticipated loss ratio and a description of how it was calculated; and (b) The estimated cumulative loss ratio, historical and anticipated, and a description of how it was calculated.	SAM Sections 3 and 4	
	14 VAC 5-130-70 B 11	The loss ratio that was originally anticipated for the policy.	AM Section 15	
	14 VAC 5-130-70 B 12	If 9, 10a, or 10b is less than 11, supporting documentation for the use of such premiums or rates.		Not Applicable
	14 VAC 5-130-70 B 13	The current number of Virginia and national members to which the revision applies for the most recent month for which such data is available, and either premiums in force, premiums earned, or premiums collected for such members in the year immediately prior to the filing of the rate revision.	AM Section 22	
	14 VAC 5-130-70 B 14	Certification by a qualified actuary that, to the best of the actuary's knowledge and judgment, the rate filing is in compliance with applicable laws and regulations of this Commonwealth and the premiums are reasonable in relation to the benefits provided.	AM Section 23	
	14 VAC 5-130-70 B 15	For coverage issued in the individual or small group health insurance markets, a certification by a qualified actuary of the		

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
		actuarial value of each plan of benefits included and the AV calculation summary.		Not Applicable
Health Insurance Issuer – Filing a Rate Revision	14 VAC 5-130-75 A 1	For individual accident and sickness insurance, individual, and group Medicare supplement insurance, and coverage issued in the individual market, with respect to filings of rate revisions for a previously approved form, benefits shall be deemed reasonable in relation to premiums provided the present values of the future and lifetime loss ratios are at least as great as the standards in 14 VAC 5-130-70 B 11.	AM Section 23	
Health Insurance Issuer – Filing a Rate Revision	14 VAC 5-130-75 B	For coverage issued in the small group health insurance market, the anticipated loss ratio over the entire period for which the revised rates are computed to provide coverage must be at least as great as the standards in 14 VAC 5-130-70 B 11.		Not Applicable
Health Insurance Issuer – Filing a Rate Revision	14 VAC 5-130-75 C	Revised premiums for policies issued on or after the effective date of the revision must meet the standards in 14 VAC 5-130-65 A, except the average annual premium shall be determined on actual rather than anticipated distribution of business.		Not Applicable
Medicare Supplement Requirements		*Applicable requirements for Medicare Supplement insurance rate filings in addition to the above:*		
Standardized Medicare Supplement Forms	14 VAC 5-170-120 A 2	All filings of rates and rating schedules shall demonstrate that expected claims in relation to premiums comply with the requirements of this section when combined with actual experience to date. Filings of rate revisions shall also demonstrate that the anticipated loss ratio over the entire future period for which the revised rates are computed to provide coverage can be expected to meet the appropriate loss ratio standards.		Not Applicable
Pre-Standardized Medicare Supplement Forms	14 VAC 5-170-120 A 3	For policies issued prior to July 30, 1992, expected claims in relation to premiums shall meet: (a) The originally filed anticipated loss ratio when combined with the actual experience since inception; (b) The appropriate loss ratio requirement from subdivisions 1 a and 1 b of this subsection when combined with actual experience beginning with July 1, 1991, to date; and (c) The appropriate loss ratio requirement from subdivisions 1 a and 1 b of this subsection over the entire future period for which the rates are computed to provide coverage.		Not Applicable
Annual Rate and Experience Filing	14 VAC 5-170-120 C	An issuer of Medicare supplement policies and certificates issued before or after July 30, 1992, in this Commonwealth shall file annually its rates, rating schedule, and supporting		

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
		documentation including ratios of incurred losses to earned premiums by policy duration for approval by the State Corporation Commission in accordance with the filing requirements and procedures prescribed by the State Corporation Commission. The supporting documentation shall also demonstrate in accordance with actuarial standards of practice using reasonable assumptions that the appropriate loss ratio standards can be expected to be met over the entire period for which rates are computed. The demonstration shall exclude active life reserves. An expected third-year loss ratio which is greater than or equal to the applicable percentage shall be demonstrated for policies or certificates in force less than three years.		Not Applicable
Actuarial Certification for Medicare Supplement Rate Revision Filings	14 VAC 5-170-120 C	For annual rate and experience filings, an actuarial certificate by a qualified actuary that the best of the actuary's knowledge and judgment, the following items are true with respect to the filing as follows: 1. The assumptions present the actuary's best judgment as to the reasonable value for each assumption and are consistent with the issuer's business plan at the time of the filing; 2. The anticipated lifetime loss ratio, future loss ratios, and except for policies issued prior to July 30, 1992, third-year loss ratios all exceed the applicable ratio; 3. Except for policies issued prior to July 30, 1992, the filed rates maintain the proper relationship between policies which had different rating methodologies; 4. The filing was prepared based on the current standards of practices as promulgated by the Actuarial Standards Board, including the data quality standard of practice, as described at: www.actuary.org; 5. The filing is in compliance with the applicable laws and regulations in this Commonwealth; and 6. The premiums are reasonable in relation to the benefits provided.		Not Applicable

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
Actuarial Certification for Medicare Supplement Rate Revision Filings	14 VAC 5-170-130 B	For proposed rate changes, an actuarial certificate by a qualified actuary that to the best of the actuary's knowledge and judgment, the following items are true with respect to the filing as follows: 1. The assumptions present the actuary's best judgment as to the reasonable value for each assumption and are consistent with the issuer's business plan at the time of the filing; 2. The anticipated lifetime loss ratio, future loss ratios, and except for policies issued prior to July 30, 1992, third-year loss ratio all exceed the applicable ratio; 3. The filing was prepared based on the current standards or practices as promulgated by the Actuary Standards Board including the data qualify standard of practice as described at: www.actuary.org; 4. The filing is in compliance with applicable laws and regulations in this Commonwealth; and 5. The premiums are reasonable in relation to the benefits provided.		Not Applicable
Chance in the Rating Structure or Methodology of a Medicare Supplement Form	14 VAC 5-170-130 D 3	A change in the rating structure or methodology shall be considered a discontinuance under subdivision 1 of this subsection unless the issuer complies with the following requirements: (a) The issuer provides an actuarial memorandum, in a form and manner prescribed by the State Corporation Commission, describing the manner in which the revised rating methodology and resultant rates differ from the existing rating methodology and existing rates. (b) The issuer does not subsequently put into effect a change of rates or rating factors that would cause the percentage differential between the discontinued and subsequent rates as described in the actuarial memorandum to change.		Not Applicable

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
For Coverage in the Individual and Small Group Health Insurance Markets Risk Pools and Index Rates	14 VAC 5-130-81 A & B	The claims experience of all enrollees in all health benefit plans are members of a single risk pool. *(Not applicable to grandfathered coverage).*		Not Applicable
	14 VAC 5-130-81 C	Each plan year or policy year, as applicable, a health insurance issuer shall: 1. Establish an index rate based on the total combined claim costs for providing essential health benefits within the single risk pool of the individual or small group market; 2. The index rate may be adjusted on a market-wide basis based on the total expected market-wide payments and charges under the risk adjustment and reinsurance programs in this Commonwealth and the health benefit exchange user fees, and 3. The premium rate for all of the health insurance issuer's plans shall use the applicable index rate, as adjusted in accordance with subsection D of this section.		Not Applicable
	14 VAC 5-130-81 D	1. The actuarial value and cost-sharing design on the plan. 2. The plan's provider network, delivery system characteristics, and utilization management practices. 3. The benefits provided under the plan that are in addition to the essential health benefits. These additional benefits shall be pooled with similar benefits within a single risk pool and the claims experience from those benefits shall be utilized to determine rate variations for plans that offer those benefits in addition to essential health benefits. 4. Administrative costs, excluding health benefit exchange user fees. 5. With respect to catastrophic plans, the expected impact of the specific eligibility categories for those plans.		Not Applicable

Access to Administrative Letters, Administrative Orders, Regulations and Laws is available at:

http://www.scc.virginia.gov/boi/laws.aspx

The Life and Health Division, Rates Section reviews rate revisions. Please contact this section at (804) 371-9110 if you have questions or need additional information about this line of insurance.

I hereby certify that I have reviewed the attached rate revision filing and determined that* it is in compliance with the rate revision checklist.

Signed: Missy Gordon

Name (please print): Missy Gordon

Company Name: Milliman, Inc.

Date: 8/30/2018

Phone No: (952) 820-2478 FAX No: (952) 897-5301

E-Mail Address missy.gordon@milliman.com

* to the best of my knowledge and belief

Clear Form

MEDAMERICA INSURANCE COMPANY

Address: 165 Court Street, Rochester, New York 14647

Supplement to the Actuarial Memorandum

August 30, 2018

Product	Number
515 Series	
Tax-Qualified Long-Term Care Policy Form	14515-VA
Home Health Care Rider	14531
Inflation Protection Rider	14532
Non-Forfeiture Rider	14533

The experience provided in this supplement reflects the pooled experience of the policy form listed above as well as similar nationwide policy forms of the 515, 700, and 780 Series for policies with inflation protection. Section 14 of the actuarial memorandum provides a description as to the appropriateness of pooling the experience of these policy forms.

Nationwide experience provided in this supplement has been restated to the rate increase level approved in Virginia, which reflects no prior rate increases.

Virginia-specific experience provided in this supplement is not considered fully credible, but is being provided as required or commonly requested.

1. Purpose of Supplement

This supplement provides additional items required by Virginia Regulation, the Rate Review Requirements Checklist (RRRC), and information commonly requested by the Bureau in its review of long-term care rate filings. The remainder of this supplement provides information regarding the request on the above-referenced product as shown in the enclosed actuarial memorandum. It may not be appropriate for other purposes.

2. Dual Loss Ratio Requirement (14VAC5-200-150.B)

14VAC5-200-150.B states that benefits under long-term care insurance policies shall be deemed reasonable in relation to premiums provided the expected loss ratio is the greater of 60% or the lifetime loss ratio used in the original pricing applied to the current rate schedule in Virginia as of December 31, 2016 plus 80% applied to any premium rate increase for individual policy forms. All present and accumulated values, including the original pricing loss ratio, shall use the maximum valuation interest rate for contract reserves.

Attachment 1 provides a demonstration that the requested rate increase passes the dual loss ratio requirement.

The original pricing loss ratio used in Attachment 1 was determined based on information readily available. According to the original pricing actuarial memorandums for the 515 and 700 Series, the original pricing loss ratio exceeded 60% using an interest rate of 5.0%. Information regarding the original pricing loss ratio and the interest rate used to certify the loss ratio is not available for the 780 Series. Based on other products that were priced during a similar era by MedAmerica a lifetime loss ratio exceeding 60% using an interest rate of 5.5% is assumed for the 780 Series. The original pricing loss ratio in Attachment 1 was calculated using the actual mix of policies sold, a 50-year projection, original pricing assumptions, and the maximum valuation interest rate at the time of pricing of 4.5%.

3. Nationwide and Virginia Projected and Historical Experience (14VAC5-130-70.B.6 and RRRC)

Attachments 2 and 3 provide actual and projected nationwide and Virginia-specific experience, respectively. Included are calendar year earned premiums, incurred claims, paid claims, change in active life reserves, annual loss ratios, annual loss ratios with change in reserve, end of year lives, and cumulative loss ratios. These attachments use the maximum valuation interest rate for contract reserves applicable to the year of issue (ranges from 4.0% to 4.5% and averages 4.4% for nationwide and 4.5% for Virginia). Values in Attachments 2 and 3 are shown (a) before and (b) after the requested rate increase. The annual loss ratios with change in reserves is equal to the sum of incurred claims and change in active life reserves divided by earned premium as defined by 14VAC5-130-70.B.6.d.

Nationwide experience is the basis for determining the requested rate increase.

MEDAMERICA INSURANCE COMPANY

Address: 165 Court Street, Rochester, New York 14647

Supplement to the Actuarial Memorandum

August 30, 2018

4. Description of Loss Ratio Calculation (14VAC5-130-70.B.10)

The lifetime loss ratio is calculated as the sum of accumulated past and discounted future claims divided by the sum of accumulated past and discounted future earned premium. The future loss ratio is calculated as anticipated claims divided by earned premiums. Historical experience is shown by claim incurral year with the loss ratio for each loss year calculated using the following formula.

$$LR_j = \frac{\sum_k \sum_t {}_jPmt_t^k * v^{t-k} + \sum_k ({}_jCR_{ValDate}^k + {}_jIBNR_{ValDate}^k) * v^{ValDate-k}}{EP_j}$$

LR_j = loss ratio for year j

${}_jPmt_t^k$ = claim payments at time t on claims incurred at time k in year j

${}_jCR_{ValDate}^k$ = open claim reserve held on December 31, 2016 for claims incurred at time k in year j

${}_jIBNR_{ValDate}^k$ = incurred but not reported reserve as of December 31, 2016 attributable to claims assumed incurred at time k in year j

EP_j = earned premium in year j

ValDate = December 31, 2016

j = year of claim incurral

k = date of claim incurral

t = actual date of claim payment

v = 1 / 1.045 = 0.956938

5. Nationwide and Virginia Bifurcated Experience (Commonly Requested)

Attachments 4 and 5 provide the same information as Attachment 1, except uses the experience for policy forms issued before October 1, 2003 for both nationwide and Virginia-specific experience, respectively.

Attachments 6 and 7 provide the same information as Exhibit II of the actuarial memorandum, except uses the experience for policy forms issued on or after October 1, 2003 for both nationwide and Virginia-specific experience, respectively. Furthermore, the nationwide experience was restated to the rate increase level approved in Virginia, which reflects no prior rate increases.

6. Description of Attachments

Attachment 1: Restated Nationwide Dual Loss Ratio Test
Attachment 2: Restated Nationwide Historical and Projected Experience by Calendar Year
Attachment 3: Virginia-Specific Historical and Projected Experience by Calendar Year
Attachment 4: Restated Nationwide Dual Loss Ratio Test for Policies Issued Prior to October 1, 2003
Attachment 5: Virginia-Specific Dual Loss Ratio Test for Policies Issued Prior to October 1, 2003
Attachment 6: Restated Nationwide 58%/85% Test for Policies Issued On or After October 1, 2003
Attachment 7: Virginia-Specific 58%/85% Test for Policies Issued On or After October 1, 2003

Attachment 1
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515, 700, and 780 Series with Inflation Protection

1	Accumulated value of current earned premium	123,825,483	x	69%	=	85,790,797
2	Present value of future projected current earned premium	30,379,629	x	69%	=	21,048,112
3a	Present value of future projected premium	53,788,852				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	23,409,223	x	80%	=	18,727,378
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**125,566,287**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					32,322,684
5b	Present value of future projected incurred claims without the inclusion of active life reserves					112,838,606
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**145,161,290**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment 2-a
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515, 700, and 780 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1997	544	0	0	185	0%	34%	10	0%
	1998	160,240	0	0	11,613	0%	7%	302	0%
	1999	746,300	0	0	227,112	0%	30%	1,149	0%
	2000	1,891,437	166,207	22,826	881,454	9%	55%	1,997	6%
	2001	3,097,755	145,833	37,085	1,835,488	5%	64%	3,186	5%
	2002	4,464,093	173,328	40,224	2,949,972	4%	70%	4,127	5%
	2003	5,100,175	185,832	66,178	4,109,697	4%	84%	4,373	4%
	2004	5,303,838	546,341	84,061	5,397,793	10%	112%	4,451	6%
	2005	5,436,526	1,457,112	452,590	5,882,237	27%	135%	4,563	10%
	2006	5,888,002	860,790	658,492	6,141,816	15%	119%	4,938	11%
	2007	6,300,977	823,352	851,150	7,080,210	13%	125%	4,975	11%
	2008	6,238,914	944,219	953,628	7,398,552	15%	134%	4,736	11%
	2009	5,876,128	1,928,368	949,952	6,475,460	33%	143%	4,419	13%
	2010	5,540,109	1,611,156	1,022,903	7,008,599	29%	156%	4,225	15%
	2011	5,293,586	2,579,836	1,365,002	6,810,295	49%	177%	4,056	17%
	2012	5,083,404	2,257,047	1,742,283	6,954,509	44%	181%	3,913	19%
	2013	4,887,563	2,960,276	2,048,860	7,444,232	61%	213%	3,787	21%
	2014	4,674,067	2,589,151	2,048,598	4,132,896	55%	144%	3,535	22%
	2015	4,371,847	2,636,903	2,940,553	4,309,410	60%	159%	3,335	24%
	2016	4,135,625	3,596,163	3,177,742	5,532,743	87%	221%	3,197	26%
Projected Future Experience (50 Years)	2017	3,952,126	3,735,855	2,677,797	5,072,628	95%	223%	3,062	28%
	2018	3,765,992	4,200,414	3,278,796	4,545,568	112%	232%	2,925	30%
	2019	3,577,399	4,673,099	3,765,248	3,943,579	131%	241%	2,786	33%
	2020	3,386,523	5,142,232	4,235,718	3,284,933	152%	249%	2,646	35%
	2021	3,194,074	5,611,850	4,713,601	2,580,493	176%	256%	2,504	38%
	2022	3,000,839	6,093,385	5,187,210	1,841,247	203%	264%	2,362	41%
	2023	2,807,701	6,588,114	5,662,308	1,071,722	235%	273%	2,219	44%
	2024	2,615,615	7,077,838	6,149,105	296,547	271%	282%	2,077	46%
	2025	2,425,672	7,553,124	6,646,778	-458,480	311%	292%	1,936	49%
	2026	2,238,965	7,995,852	7,147,283	-1,185,051	357%	304%	1,797	52%
	2027	2,056,555	8,384,268	7,632,658	-1,863,524	408%	317%	1,660	56%
	2028	1,879,531	8,707,625	8,089,640	-2,494,166	463%	331%	1,528	59%
	2029	1,708,966	8,953,509	8,505,149	-3,059,750	524%	345%	1,399	62%
	2030	1,545,898	9,107,649	8,865,934	-3,544,124	589%	360%	1,276	65%
	2031	1,391,220	9,174,211	9,161,375	-3,950,882	659%	375%	1,158	67%
	2032	1,245,458	9,217,658	9,396,350	-4,298,958	740%	395%	1,046	70%
	2033	1,108,877	9,249,138	9,580,817	-4,594,034	834%	420%	940	73%
	2034	981,865	9,210,398	9,712,153	-4,825,443	938%	447%	841	75%
	2035	864,817	9,089,066	9,782,757	-4,977,245	1,051%	475%	749	78%
	2036	757,912	8,900,240	9,788,675	-5,059,137	1,174%	507%	665	80%
	2037	661,041	8,653,721	9,729,509	-5,077,725	1,309%	541%	587	82%
	2038	573,894	8,362,574	9,608,192	-5,040,556	1,457%	579%	516	84%
	2039	496,015	8,040,777	9,430,406	-4,960,816	1,621%	621%	452	86%
	2040	426,897	7,681,099	9,200,540	-4,831,325	1,799%	668%	394	88%
	2041	365,965	7,292,242	8,923,057	-4,664,814	1,993%	718%	343	89%
	2042	312,527	6,877,944	8,602,679	-4,465,368	2,201%	772%	297	91%
	2043	265,867	6,441,456	8,244,130	-4,235,250	2,423%	830%	256	92%
	2044	225,321	5,999,978	7,854,351	-3,991,592	2,663%	891%	220	93%
	2045	190,261	5,556,020	7,440,447	-3,731,410	2,920%	959%	189	94%
	2046	160,080	5,119,515	7,009,628	-3,458,610	3,198%	1038%	161	95%
	2047	134,257	4,695,168	6,569,056	-3,187,138	3,497%	1123%	138	96%
	2048	112,238	4,287,915	6,125,608	-2,921,338	3,820%	1218%	117	96%
	2049	93,538	3,907,733	5,686,469	-2,664,390	4,178%	1329%	99	97%
	2050	77,744	3,552,854	5,257,508	-2,418,968	4,570%	1458%	84	98%
	2051	64,462	3,215,426	4,841,667	-2,184,781	4,988%	1599%	71	98%
	2052	53,316	2,896,833	4,441,035	-1,961,485	5,433%	1754%	59	98%
	2053	44,009	2,600,069	4,057,629	-1,750,671	5,908%	1930%	50	99%
	2054	36,255	2,325,491	3,693,186	-1,554,499	6,414%	2127%	42	99%
	2055	29,815	2,077,445	3,349,924	-1,375,840	6,968%	2353%	35	99%
	2056	24,477	1,847,974	3,028,249	-1,211,742	7,550%	2599%	29	100%
	2057-2061	69,226	6,283,990	10,995,277	-4,111,905	9,078%	3138%	85	100%
	2062-2066	23,472	2,845,075	5,770,209	-1,960,754	12,121%	3768%	31	101%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	123,825,483	32,322,684	22,531,915	90,584,274	26%	99%
Future	34,747,291	127,059,053	129,463,576	-90,451,532	366%	105%
Lifetime	158,572,775	159,381,737	151,995,491	132,742	101%	101%

Attachment 2-b
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Increase - After Requested Rate Increase
515, 700, and 780 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1997	544	0	0	185	0%	34%	10	0%
	1998	160,240	0	0	11,613	0%	7%	302	0%
	1999	746,300	0	0	227,112	0%	30%	1,149	0%
	2000	1,891,437	166,207	22,826	881,454	9%	55%	1,997	6%
	2001	3,097,755	145,833	37,085	1,835,488	5%	64%	3,186	5%
	2002	4,464,093	173,328	40,224	2,949,972	4%	70%	4,127	5%
	2003	5,100,175	185,832	66,178	4,109,697	4%	84%	4,373	4%
	2004	5,303,838	546,341	84,061	5,397,793	10%	112%	4,451	6%
	2005	5,436,526	1,457,112	452,590	5,882,237	27%	135%	4,563	10%
	2006	5,888,002	860,790	658,492	6,141,816	15%	119%	4,938	11%
	2007	6,300,977	823,352	851,150	7,080,210	13%	125%	4,975	11%
	2008	6,238,914	944,219	953,628	7,398,552	15%	134%	4,736	11%
	2009	5,876,128	1,928,368	949,952	6,475,460	33%	143%	4,419	13%
	2010	5,540,109	1,611,156	1,022,903	7,008,599	29%	156%	4,225	15%
	2011	5,293,586	2,579,836	1,365,002	6,810,295	49%	177%	4,056	17%
	2012	5,083,404	2,257,047	1,742,283	6,954,509	44%	181%	3,913	19%
	2013	4,887,563	2,960,276	2,048,860	7,444,232	61%	213%	3,787	21%
	2014	4,674,067	2,589,151	2,048,598	4,132,896	55%	144%	3,535	22%
	2015	4,371,847	2,636,903	2,940,553	4,309,410	60%	159%	3,335	24%
	2016	4,135,625	3,596,163	3,177,742	5,532,743	87%	221%	3,197	26%
Projected Future Experience (50 Years)	2017	3,952,126	3,735,855	2,677,797	5,072,628	95%	223%	3,062	28%
	2018	4,126,469	4,134,898	3,265,713	-3,732,903	100%	10%	2,794	30%
	2019	5,829,347	4,219,157	3,661,036	-5,608,936	72%	-24%	2,533	32%
	2020	5,826,847	4,566,699	4,012,163	2,769,307	78%	126%	2,405	34%
	2021	5,485,400	4,976,108	4,377,868	2,188,992	91%	131%	2,277	35%
	2022	5,143,217	5,394,900	4,748,444	1,579,199	105%	136%	2,148	37%
	2023	4,801,918	5,824,368	5,127,279	943,639	121%	141%	2,019	39%
	2024	4,463,229	6,248,687	5,523,022	302,441	140%	147%	1,890	41%
	2025	4,129,102	6,659,438	5,934,720	-323,015	161%	153%	1,762	43%
	2026	3,801,482	7,041,252	6,354,490	-926,163	185%	161%	1,636	46%
	2027	3,482,275	7,375,590	6,764,557	-1,490,826	212%	169%	1,512	48%
	2028	3,173,426	7,653,334	7,152,169	-2,016,971	241%	178%	1,392	50%
	2029	2,876,829	7,863,923	7,505,181	-2,489,868	273%	187%	1,275	52%
	2030	2,594,290	7,995,054	7,811,832	-2,895,989	308%	197%	1,163	54%
	2031	2,327,326	8,050,403	8,062,730	-3,238,329	346%	207%	1,056	56%
	2032	2,076,772	8,086,148	8,262,013	-3,532,447	389%	219%	954	59%
	2033	1,842,970	8,111,857	8,418,228	-3,782,797	440%	235%	858	61%
	2034	1,626,449	8,075,648	8,528,742	-3,980,218	497%	252%	768	62%
	2035	1,427,742	7,967,266	8,586,696	-4,111,401	558%	270%	684	64%
	2036	1,247,000	7,800,188	8,588,541	-4,184,605	626%	290%	607	66%
	2037	1,083,882	7,583,440	8,533,969	-4,205,630	700%	312%	536	68%
	2038	937,712	7,328,405	8,425,599	-4,180,613	782%	336%	472	69%
	2039	807,590	7,047,281	8,268,441	-4,120,076	873%	362%	413	71%
	2040	692,534	6,733,575	8,066,334	-4,018,169	972%	392%	361	72%
	2041	591,481	6,394,852	7,823,170	-3,885,385	1,081%	424%	314	73%
	2042	503,185	6,034,456	7,543,086	-3,724,939	1,199%	459%	272	74%
	2043	426,388	5,655,074	7,230,184	-3,538,422	1,326%	496%	235	75%
	2044	359,921	5,271,035	6,890,368	-3,339,871	1,464%	537%	202	76%
	2045	302,685	4,884,828	6,529,730	-3,126,801	1,614%	581%	173	77%
	2046	253,619	4,505,015	6,154,481	-2,902,409	1,776%	632%	148	77%
	2047	211,828	4,135,574	5,770,788	-2,678,514	1,952%	688%	126	78%
	2048	176,352	3,780,871	5,384,587	-2,458,708	2,144%	750%	107	79%
	2049	146,362	3,449,683	5,002,105	-2,245,728	2,357%	823%	91	79%
	2050	121,152	3,140,535	4,628,466	-2,041,831	2,592%	907%	77	79%
	2051	100,051	2,846,033	4,266,145	-1,846,705	2,845%	999%	65	80%
	2052	82,428	2,567,778	3,916,932	-1,660,174	3,115%	1101%	55	80%
	2053	67,782	2,308,317	3,582,558	-1,483,644	3,406%	1217%	46	80%
	2054	55,635	2,067,670	3,264,468	-1,319,061	3,717%	1346%	38	81%
	2055	45,592	1,849,807	2,964,564	-1,168,709	4,057%	1494%	32	81%
	2056	37,307	1,647,452	2,683,121	-1,030,231	4,416%	1654%	27	81%
	2057-2061	104,817	5,613,491	9,771,802	-3,501,866	5,356%	2015%	79	82%
	2062-2066	35,389	2,541,897	5,146,288	-1,670,541	7,183%	2462%	29	82%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	123,825,483	32,322,684	22,531,915	90,584,274	26%	99%
Future	53,788,852	112,838,606	115,825,780	-90,471,311	210%	42%
Lifetime	177,614,335	145,161,290	138,357,695	112,963	82%	82%

Attachment 3-a
MedAmerica and CICA
Actual and Projected Experience by Calendar Year
Virginia-Specific Experience - Before Requested Rate Increase
515 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1999	16,561	0	0	1,322	0%	8%	41	0%
	2000	62,948	0	0	26,433	0%	42%	62	0%
	2001	94,691	141,810	0	55,956	150%	209%	112	79%
	2002	158,597	0	2,094	101,319	0%	64%	166	43%
	2003	184,163	403	17,422	147,387	0%	80%	167	28%
	2004	184,613	0	35,598	194,934	0%	106%	170	22%
	2005	182,229	441	41,357	189,533	0%	104%	162	18%
	2006	185,486	2,014	39,137	203,430	1%	111%	164	15%
	2007	182,360	0	35,668	233,759	0%	128%	156	13%
	2008	176,748	0	2,052	225,981	0%	128%	150	12%
	2009	170,953	193,978	2,746	213,295	113%	238%	142	21%
	2010	165,646	0	32,629	241,858	0%	146%	138	19%
	2011	161,613	410,290	42,435	245,537	254%	406%	134	35%
	2012	154,551	92,686	90,855	206,957	60%	194%	128	36%
	2013	149,863	28,690	210,036	234,511	19%	176%	123	35%
	2014	142,693	4,703	187,934	210,653	3%	151%	120	34%
	2015	135,158	25,432	135,204	112,814	19%	102%	112	33%
	2016	128,031	377,388	98,298	156,938	295%	417%	107	42%
Projected Future Experience (50 Years)	2017	120,473	143,718	110,650	147,732	119%	242%	102	44%
	2018	113,658	158,676	133,473	128,235	140%	252%	97	47%
	2019	106,876	174,465	151,204	106,150	163%	263%	92	49%
	2020	100,148	189,534	167,351	81,711	189%	271%	87	52%
	2021	93,487	204,542	182,353	55,744	219%	278%	82	55%
	2022	86,917	220,325	196,594	28,779	253%	287%	77	58%
	2023	80,457	236,424	210,725	1,541	294%	296%	72	61%
	2024	74,132	251,984	225,323	-25,181	340%	306%	67	65%
	2025	67,970	267,264	240,548	-51,171	393%	318%	62	68%
	2026	61,994	281,245	256,101	-75,440	454%	332%	57	71%
	2027	56,233	292,111	270,944	-96,920	519%	347%	53	75%
	2028	50,719	298,675	284,251	-114,452	589%	363%	48	78%
	2029	45,478	301,937	295,524	-129,546	664%	379%	44	81%
	2030	40,537	301,349	304,278	-141,400	743%	395%	40	84%
	2031	35,926	297,040	310,115	-148,951	827%	412%	36	87%
	2032	31,660	290,890	313,099	-153,555	919%	434%	32	90%
	2033	27,740	283,930	313,597	-156,879	1,024%	458%	29	93%
	2034	24,165	275,371	311,809	-158,767	1,140%	483%	25	95%
	2035	20,935	264,980	307,781	-157,389	1,266%	514%	22	98%
	2036	18,044	253,140	301,637	-153,856	1,403%	550%	20	100%
	2037	15,479	240,390	293,598	-148,656	1,553%	593%	17	102%
	2038	13,226	228,157	284,107	-143,231	1,725%	642%	15	103%
	2039	11,255	215,874	273,507	-136,873	1,918%	702%	13	105%
	2040	9,546	202,741	261,933	-129,402	2,124%	768%	11	106%
	2041	8,074	190,133	249,684	-122,191	2,355%	841%	10	108%
	2042	6,814	177,003	236,872	-113,753	2,597%	928%	9	109%
	2043	5,740	164,097	223,649	-105,122	2,859%	1027%	7	110%
	2044	4,829	151,379	210,164	-96,082	3,134%	1145%	6	111%
	2045	4,059	139,404	196,636	-87,800	3,434%	1271%	5	111%
	2046	3,411	128,466	183,323	-80,173	3,766%	1416%	5	112%
	2047	2,868	117,309	170,237	-72,882	4,091%	1549%	4	113%
	2048	2,412	106,651	157,442	-65,739	4,422%	1696%	3	113%
	2049	2,030	96,532	145,020	-59,146	4,756%	1842%	3	114%
	2050	1,709	87,700	133,150	-53,265	5,131%	2015%	3	114%
	2051	1,445	80,441	122,065	-48,368	5,567%	2220%	2	114%
	2052	1,223	74,645	111,951	-44,602	6,104%	2457%	2	115%
	2053	1,038	69,378	102,819	-41,012	6,686%	2734%	2	115%
	2054	883	64,972	94,680	-37,875	7,356%	3068%	1	115%
	2055	754	61,306	87,531	-35,480	8,134%	3427%	1	116%
	2056	643	58,366	81,346	-33,854	9,073%	3810%	1	116%
	2057-2061	2,049	249,215	338,007	-152,790	12,163%	4706%	3	117%
	2062-2066	860	152,929	238,065	-109,753	17,790%	5023%	1	117%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,895,059	1,639,978	1,195,543	3,002,615	42%	119%
Future	979,698	4,061,580	4,226,230	-2,994,630	415%	109%
Lifetime	4,874,757	5,701,558	5,421,773	7,985	117%	117%

Attachment 3-b
MedAmerica and CICA
Actual and Projected Experience by Calendar Year
Virginia-Specific Experience - After Requested Rate Increase
515 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1999	16,561	0	0	1,322	0%	8%	41	0%
	2000	62,948	0	0	26,433	0%	42%	62	0%
	2001	94,691	141,810	0	55,956	150%	209%	112	79%
	2002	158,597	0	2,094	101,319	0%	64%	166	43%
	2003	184,163	403	17,422	147,387	0%	80%	167	28%
	2004	184,613	0	35,598	194,934	0%	106%	170	22%
	2005	182,229	441	41,357	189,533	0%	104%	162	18%
	2006	185,486	2,014	39,137	203,430	1%	111%	164	15%
	2007	182,360	0	35,668	233,759	0%	128%	156	13%
	2008	176,748	0	2,052	225,981	0%	128%	150	12%
	2009	170,953	193,978	2,746	213,295	113%	238%	142	21%
	2010	165,646	0	32,629	241,858	0%	146%	138	19%
	2011	161,613	410,290	42,435	245,537	254%	406%	134	35%
	2012	154,551	92,686	90,855	206,957	60%	194%	128	36%
	2013	149,863	28,690	210,036	234,511	19%	176%	123	35%
	2014	142,693	4,703	187,934	210,653	3%	151%	120	34%
	2015	135,158	25,432	135,204	112,814	19%	102%	112	33%
	2016	128,031	377,388	98,298	156,938	295%	417%	107	42%
Projected Future Experience (50 Years)	2017	120,473	143,718	110,650	147,732	119%	242%	102	44%
	2018	131,934	154,977	132,741	-226,030	117%	-54%	91	47%
	2019	191,721	156,373	146,828	-165,024	82%	-5%	83	48%
	2020	187,778	167,697	158,521	66,613	89%	125%	78	49%
	2021	175,289	180,563	169,423	45,444	103%	129%	74	51%
	2022	162,969	194,068	179,916	23,462	119%	133%	69	53%
	2023	150,857	207,807	190,556	1,256	138%	139%	65	55%
	2024	138,998	221,036	201,864	-20,528	159%	144%	60	57%
	2025	127,444	233,996	213,992	-41,716	184%	151%	56	59%
	2026	116,239	245,801	226,640	-61,500	211%	159%	52	61%
	2027	105,437	254,872	238,800	-79,011	242%	167%	47	64%
	2028	95,098	260,185	249,709	-93,304	274%	175%	43	66%
	2029	85,271	262,623	258,902	-105,609	308%	184%	39	68%
	2030	76,008	261,726	265,952	-115,272	344%	193%	36	71%
	2031	67,361	257,627	270,508	-121,428	382%	202%	32	73%
	2032	59,362	251,962	272,626	-125,180	424%	214%	29	75%
	2033	52,013	245,625	272,624	-127,890	472%	226%	26	76%
	2034	45,310	237,938	270,675	-129,430	525%	239%	23	78%
	2035	39,253	228,702	266,821	-128,306	583%	256%	20	80%
	2036	33,833	218,255	261,171	-125,426	645%	274%	18	81%
	2037	29,024	207,064	253,918	-121,187	713%	296%	16	83%
	2038	24,798	196,355	245,446	-116,764	792%	321%	14	84%
	2039	21,103	185,633	236,052	-111,581	880%	351%	12	85%
	2040	17,899	174,209	225,851	-105,491	973%	384%	10	86%
	2041	15,140	163,263	215,102	-99,612	1,078%	420%	9	87%
	2042	12,777	151,895	203,898	-92,734	1,189%	463%	8	88%
	2043	10,762	140,739	192,370	-85,697	1,308%	511%	7	89%
	2044	9,055	129,764	180,645	-78,327	1,433%	568%	6	89%
	2045	7,611	119,442	168,908	-71,576	1,569%	629%	5	90%
	2046	6,396	110,024	157,378	-65,358	1,720%	698%	4	90%
	2047	5,377	100,431	146,064	-59,415	1,868%	763%	4	91%
	2048	4,522	91,274	135,017	-53,591	2,018%	833%	3	91%
	2049	3,805	82,587	124,307	-48,217	2,170%	903%	3	92%
	2050	3,205	75,007	114,083	-43,423	2,340%	986%	2	92%
	2051	2,709	68,780	104,544	-39,431	2,539%	1083%	2	92%
	2052	2,293	63,810	95,846	-36,360	2,783%	1197%	2	92%
	2053	1,946	59,294	87,997	-33,434	3,048%	1329%	1	93%
	2054	1,656	55,518	81,006	-30,876	3,352%	1488%	1	93%
	2055	1,413	52,375	74,867	-28,924	3,706%	1659%	1	93%
	2056	1,206	49,854	69,558	-27,598	4,133%	1845%	1	93%
	2057-2061	3,842	212,786	288,832	-124,557	5,539%	2296%	3	94%
	2062-2066	1,612	130,502	203,265	-89,473	8,097%	2546%	1	94%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,895,059	1,639,978	1,195,543	3,002,615	42%	119%
Future	1,649,976	3,568,616	3,755,097	-2,996,105	216%	35%
Lifetime	5,545,035	5,208,593	4,950,640	6,510	94%	94%

Attachment 4
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515, 700, and 780 Series with Inflation Protection Issued Prior to October 1, 2003

1	Accumulated value of current earned premium	97,248,546	x	71%	=	69,151,892
2	Present value of future projected current earned premium	17,727,027	x	71%	=	12,605,406
3a	Present value of future projected premium	34,325,514				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	16,598,488	x	80%	=	13,278,790
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**95,036,089**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					29,548,362
5b	Present value of future projected incurred claims without the inclusion of active life reserves					81,253,040
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**110,801,401**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which is 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment 5
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica and CICA Virginia-Specific Experience
515 Series with Inflation Protection Issued Prior to October 1, 2003

1	Accumulated value of current earned premium	3,473,800	x	72%	=	2,487,098
2	Present value of future projected current earned premium	647,209	x	72%	=	463,375
3a	Present value of future projected premium	1,263,510				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	616,301	x	80%	=	493,041
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**3,443,514**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					1,523,292
5b	Present value of future projected incurred claims without the inclusion of active life reserves					2,942,734
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**4,466,027**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which is 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment 6
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515, 700, and 780 Series with Inflation Protection Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	26,576,937	x	58%	=	15,414,623
2a	Accumulated value of earned premium	26,576,937				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	12,663,578	x	58%	=	7,344,875
4a	Present value of future projected premium	19,463,338				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	6,799,760	x	85%	=	5,779,796
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**28,539,295**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					2,774,323
6b	Present value of future projected incurred claims without the inclusion of active life reserves					36,323,401
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**39,097,724**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment 7
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica and CICA Virginia-Specific Experience
515 Series with Inflation Protection Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	421,258	x	58%	=	244,330
2a	Accumulated value of earned premium	421,258				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	190,938	x	58%	=	110,744
4a	Present value of future projected premium	386,466				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	195,528	x	85%	=	166,198
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**521,273**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					116,686
6b	Present value of future projected incurred claims without the inclusion of active life reserves					719,764
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**836,449**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

MEDAMERICA INSURANCE COMPANY

Address: 165 Court Street, Rochester, New York 14647

Actuarial Memorandum

November 12, 2019

Product	Number
515 Series	
Tax-Qualified Long-Term Care Policy Form	14515-VA
Home Health Care Rider	14531
Inflation Protection Rider	14532
Non-Forfeiture Rider	14533

This is an individual tax-qualified policy form that provides long-term care coverage. Combined Insurance Company of America (CICA) wrote and issued this policy form in Virginia from February 1999 through October 2006. The form is no longer being marketed in any jurisdiction.

In 2008, MedAmerica Insurance Company (MedAmerica) acquired the long-term care block of business issued by CICA from Ace Ltd. and subsequently submitted a certificate of assumption filing. As a result, most of the nationwide policies are now on MedAmerica paper; however, approximately 16% of the policyholders nationwide objected to the assumption filing and remain on CICA paper. In Virginia, approximately 13% of the in-force policies are on CICA paper. MedAmerica has 100% of the risk on these series, including policies on CICA paper, and administers and manages the entire block.

As indicated in the enclosed cover letter, the company is requesting a rate increase in this jurisdiction for policies with inflation protection. The experience provided in this actuarial memorandum reflects the pooled experience of the policy forms listed above as well as similar nationwide policy forms of the 515, 700, and 780 Series for policies with inflation protection, except in Sections 19 and 22, which reflect all policies regardless of inflation protection option. Section 14 provides a description as to the appropriateness of pooling the experience of these policy forms. Section 18 provides the requested rate increase based on the nationwide distribution of business.

As described in the October 25, 2019 response letter, the company is willing to forgo the requested rate increase on the 515 Series post-rate stability policies at this time in order to expedite the resolution of this filing given that it has been pending since May 2018 and there is relatively small amount of business that is post-rate stability. The October 25 response letter provides the Virginia-specific rate increase for the above-listed form with inflation protection that varies by the issue date of the policy (i.e., no rate increase for post-rate stability policies on the 515 policy form). No revision has been made to the 700 and 780 Series as no policies are in force with inflation in Virginia. Based on our understanding of the October 30, 2019 phone call between MedAmerica and the Virginia Bureau of Insurance (Bureau), Sections 14 and 19 below have been updated to reflect the Virginia-specific increase for the 515 Series.

1. Purpose of Filing

This actuarial memorandum has been prepared for the purpose of demonstrating that the requested rate increase meets the minimum requirements of your jurisdiction and demonstrating compliance with the applicable regulations. It may not be suitable for other purposes.

2. Description of Benefits

These are individually underwritten policy forms that provide comprehensive coverage on a reimbursement basis. These forms have benefit eligibility requirements that involve activities of daily living (ADL) deficiencies or cognitive impairment. Waiver of premium is provided after the policyholder has been receiving covered care for 90 days and as long as the person continues to receive covered benefits. A daily benefit, benefit period, and elimination period were selected at issue. All policies have a lifetime premium payment term.

At issue, the insured may have been offered the option to elect an inflation protection rider that provides for benefit levels that increase on each anniversary date by 5% compounded annually for the life of the

insured. The increasing benefits apply even when the insured is in claim status. This rate increase applies only to policies with this inflation protection rider.

The available choices for benefit period and elimination period are shown in Section 21 below.

At issue, the insured may have been offered the option of selecting riders that provide the following types of coverage: non-forfeiture benefit, return of premium benefit, or additional community care benefit.

A contingent benefit upon lapse (CBUL) will be available to all insureds at the time of the rate increase.

3. Renewability

These policies are guaranteed renewable for life.

4. Applicability

This rate increase applies to all policies with inflation protection issued on these forms in this state. The rate changes will apply to the premium of the base form and all applicable options and riders associated with the base form.

5. Actuarial Assumptions

The following assumptions are used to project the experience shown in this filing.

a. Morbidity reflects claim costs developed using the 2014 Milliman *Long-Term Care Guidelines* (*Guidelines*) with adjustments for underwriting selection and an all-lives exposure basis. The claim costs were further adjusted based on historical claim experience by series, attained age, duration, and coverage type, to the extent credible. Two years of retrospective improvement was applied to bring these assumptions forward to 2016 using scalars of 0.980 for females and 0.970 for males.

b. Mortality Rates reflect the 1994 Group Annuitant Mortality (GAM) Static gender-distinct table with 22 years of retrospective improvement applied to bring this table forward to 2016 using scalars of 0.896 for females and 0.802 for males. These mortality rates are further adjusted based on historical mortality experience by issue age band and duration as shown in the following table.

Mortality Durational Adjustment Factors												
	Issue Age											
Duration*	**<25**	**25-29**	**30-34**	**35-39**	**40-44**	**45-49**	**50-54**	**55-59**	**60-64**	**65-69**	**70-74**	**75+**
1	25%	25%	25%	25%	25%	25%	25%	25%	25%	25%	25%	20%
2	35	35	35	35	35	35	35	35	35	35	35	30
3	40	40	40	40	40	40	40	40	40	40	40	45
4	43	43	43	43	43	43	43	43	44	45	45	50
5	46	46	46	46	46	46	46	46	48	50	50	55
6	49	49	49	49	49	49	49	49	52	55	55	60
7	52	52	52	52	52	52	52	52	56	60	60	65
8	55	55	55	55	55	55	55	55	60	65	65	70
9	56	56	56	56	56	56	56	56	61	68	69	76
10	57	57	57	57	57	57	57	57	62	71	73	82
11	58	58	58	58	58	58	58	58	63	74	77	88
12	59	59	59	59	59	59	59	59	64	77	81	94
13	60	60	60	60	60	60	60	60	65	80	85	100
14	62	62	62	62	62	62	62	62	69	82	88	101
15	64	64	64	64	64	64	64	64	73	84	91	102
16	66	66	66	66	66	66	66	66	77	86	94	103
17	68	68	68	68	68	68	68	68	81	88	97	104
18	70	70	70	70	70	70	70	70	85	90	100	105
23	70	70	70	70	70	70	70	85	90	100	105	105
28	70	70	70	70	70	70	85	90	100	105	105	105
33	70	70	70	70	70	85	90	100	105	105	105	105
38	70	70	70	70	85	90	100	105	105	105	105	105
43	70	70	70	85	90	100	105	105	105	105	105	105
48	70	70	85	90	100	105	105	105	105	105	105	105
53	70	85	90	100	105	105	105	105	105	105	105	105
58	85	90	100	105	105	105	105	105	105	105	105	105
63	90	100	105	105	105	105	105	105	105	105	105	105
68	100	105	105	105	105	105	105	105	105	105	105	105
73+	105	105	105	105	105	105	105	105	105	105	105	105

** The assumption varies by duration for 18+, but is shown every five years for display purposes.*

c. Voluntary Lapse Rates vary by policy duration and series. All policies are in duration 7 or later as of the valuation date.

Duration	515 Series	700 and 780 Series
7	6.00%	3.50%
8	4.00	3.00
9	3.00	2.50
10	3.00	1.50
11	2.00	1.50
12+	2.00	1.50

d. Benefit Expiry Rates reflect assumed policy termination due to exhaustion of benefits on limited benefit period policies. The rates are based on the *Guidelines* with adjustments for historical benefit expiry experience and vary by gender, benefit period, and attained age as shown in the following table.

Gender	Benefit Period in Days	Attained Age*										
		<65	65	70	75	80	85	90	95	100	105	110+
Female	400	0.0%	0.1%	0.1%	0.3%	0.7%	2.5%	6.1%	10.7%	13.4%	16.7%	33.0%
	800	0.0	0.0	0.1	0.2	0.5	1.6	4.5	8.7	11.7	16.3	33.0
	1200	0.0	0.0	0.1	0.1	0.4	1.2	3.4	6.9	9.7	15.0	33.0
	1600	0.0	0.0	0.0	0.1	0.3	1.0	2.5	5.0	7.8	13.2	33.0
	Unlimited	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Male	400	0.0	0.0	0.1	0.2	0.5	1.5	3.9	6.3	7.8	9.4	33.0
	800	0.0	0.0	0.1	0.1	0.3	1.0	2.5	4.3	5.4	7.3	33.0
	1200	0.0	0.0	0.1	0.1	0.2	0.7	1.7	3.0	4.0	5.8	33.0
	1600	0.0	0.0	0.0	0.1	0.1	0.4	1.1	2.0	2.8	4.6	33.0
	Unlimited	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

** The assumption varies by attained age, but is shown every five years for display purposes.*

e. Policyholder Behavior Due to the Rate Increase. At the time of a rate increase, insureds have the option to elect a CBUL or reduced benefit options (RBO). An increase in morbidity for adverse selection due to the rate increase based on the percentage of policies that elect CBUL and RBO is assumed.

Insureds who elect a CBUL are modeled as a lapse (i.e., the CBUL benefit is not modeled), which results in a slightly lower lifetime loss ratio than if the CBUL benefit had been modeled. The following table provides the CBUL and RBO election rates, reduction to premiums and benefits due to the impact of RBO elections, and increase in morbidity. These assumptions are shown for each series and correspond to the magnitude of the average nationwide request shown in Section 18.

Series	CBUL Election Rate	RBO Election Rate	Approximate Reduction for RBO[1]	Morbidity Increase for Adverse Selection
515	10.0%	15.0%	7.5%	4.5%
700	10.0	17.5	9.7	5.0
780	5.0	12.5	3.4	3.0

[1] The reduction in premiums and benefits due to the impact of RBO election varies based on the level of the average nationwide requested rate increase in Section 18.

f. Interest Rate of 5.00% is used for accumulating and discounting earned premiums and incurred claims in the calculation of cumulative loss ratios. This rate represents MedAmerica's expectation of its long-term investment earnings rate, which is supported by the average net investment earnings rate projected for MedAmerica's cash flow testing. The maximum valuation interest rate is used to demonstrate compliance with the 58%/85% test required by rate stability regulation, as described in Section 14 below.

g. Annual Improvement in the mortality and morbidity assumptions is assumed for 15 years starting in 2017. Annual mortality improvement is assumed to be 0.5% and 1.0% for females and males, respectively. Annual morbidity improvement is assumed to be 1.0% and 1.5% for females and males, respectively.

h. Expenses have not been explicitly projected. Originally filed expense assumptions are assumed to remain appropriate, except that reductions are made to the renewal commission rates so that the total commissions paid before and after any increase in premium are similar (i.e., commissions are not paid on the increased premium).

The above assumptions are based on the experience of policies issued by CICA and its sister company Combined Life Insurance Company of New York (CLICNY) that issued the same products, industry

experience, and judgment. These assumptions are based on the experience of the particular policy forms in this filing and other similar policy forms where appropriate. In developing the persistency assumptions, policy termination experience through December 31, 2015 was used, whereas for the morbidity assumption, claim experience through December 31, 2014 was used. The above assumptions are deemed reasonable for the particular policy forms in this filing and are considered "most likely" (without explicit margin).

In establishing the assumptions described in this section, the policy design, underwriting, and claims adjudication practices for the above-referenced policy forms were taken into consideration. Appendix A to this memorandum provides a description of the development of and justification for the assumptions used in this filing.

The company is not currently marketing long-term care products. As a result, the requirement to reflect on any assumptions that deviate from those used for pricing other forms currently available for sale is not applicable.

6. Marketing Method

These policy forms were marketed by agents of CICA and by estate-planning consultants.

7. Underwriting Description

These policies were individually underwritten with the use of various underwriting tools in addition to the application, which may have included medical records, cognitive screening, telephone interview and/or face-to-face assessment.

8. Premiums

Premiums are unisex and payable for life. The premiums may vary by policy form, issue age, elimination period, benefit period, initial daily benefit, inflation option, marital status at issue, and the selection of any riders.

9. Issue Age Range

Issue ages are from 18 to 84.

10. Area Factors

Area factors are not used for these products.

11. Premium Modalization Rules

The following modal factors and percent distributions (based on the nationwide in-force count as of December 31, 2016 for policies with inflation protection) are applied to the annual premium (AP):

Premium Mode	Modal Factors	Percent Distribution
Annual	1.00*AP	23%
Semi-Annual	0.52*AP	4
Quarterly	0.26*AP	3
Monthly	0.09*AP	70

12. Reserves

Active life reserves and reserves for the election of a CBUL have not been used in the experience exhibits for this rate increase analysis. Claim reserves as of December 31, 2016 have been discounted

to the incurral date of each respective claim and included in historical incurred claims. An incurred but not reported (IBNR) reserve balance as of December 31, 2016 has been allocated to the 2016 calendar year and included in historical incurred claims.

13. Trend Assumptions

As this is not medical insurance, an explicit medical cost trend is not included in the projections.

14. Demonstration of Satisfaction of Loss Ratio Requirements

This filing uses nationwide experience of all policies with inflation protection of the 515, 700, and 780 Series. Pooling these forms' experience is appropriate as the forms have similar benefits, it is consistent with how MedAmerica manages the business, and combining experience increases credibility.

Exhibit I provides actual and projected experience using current assumptions. Actual experience is provided from inception through 2016 and then projected on a seriatim basis for 50 years using the current assumptions described above in Section 5. The actual and projected experience is based on nationwide premiums that reflect prior rate increases filed for use on policies with inflation protection between 2013 and 2016, which average 19% across all jurisdictions and series. The after increase projected experience reflects the additional increase needed to achieve the cumulative increase by series (shown in Section 18) on a seriatim basis.

This exhibit uses the maximum valuation interest rate for contract reserves applicable for the year of issue (ranges from 4.0% to 4.5% and averages 4.4%). Values in Exhibit I are shown (a) before and (b) after the requested rate increase. Included are calendar year earned premiums, incurred claims, end of year lives, annual loss ratios, and cumulative loss ratios. The enclosed supplemental actuarial memorandum provides a discussion into how the dual loss ratio requirement specified in 14VAC5-200-150.B is satisfied.

The following table provides the lifetime loss ratios by series for policies with inflation protection. The 'All' row corresponds to that shown in Exhibit I.

Lifetime Loss Ratios at the Maximum Valuation Interest Rate by Series for Policies with Inflation Protection

Series	Before Increase	After Increase
All	98%	81%
515	101	83
700	94	71
780	85	76

In response to the October 30 phone call, the following table provides the same information as that above, except it reflects the Virginia-specific increase of the October 25 response letter. Comparing these two tables illustrates that any projections that reflect the Virginia-specific rate increase will result in a higher lifetime loss ratio compared to that using the nationwide request.

Lifetime Loss Ratios at the Maximum Valuation Interest Rate by Series for Policies with Inflation Protection Reflecting the Virginia-Specific Rate Increase[1]

Series	Before Increase	After Increase
All	98%	83%
515	101	85
700	94	71
780	85	76

[1] Virginia-specific rate increase request for 515 Series of 130% for policies with inflation protection issued prior to October 1, 2003 and 0% for all other policies. No revision has been made to the 700 and 780 Series nationwide request as no policies are in force with inflation in Virginia.

Exhibit II provides a demonstration that the nationwide requested rate increase meets the 58%/85% test required by post-rate stability regulation. This exhibit shows that the sum of the accumulated value of incurred claims without the inclusion of active life reserves, and the present value of projected incurred claims, without the inclusion of active life reserves, will not be less than the sum of the following:

1. Accumulated value of the initial earned premium times 58%,
2. 85% of the accumulated value of prior premium rate schedule increases,
3. Present value of projected initial earned premium times 58%, and
4. 85% of the present value of projected premium in excess of the projected initial earned premium.

The projected incurred claims in Exhibit II were increased by 15% from the current assumptions described in Section 5 to reflect assumptions that include moderately adverse conditions.

Present and accumulated values in Exhibit II are determined at the maximum valuation interest rate for contract reserves applicable for the year of issue, which, as described above, averages 4.4%.

The following table demonstrates that the 58%/85% test is passed by series for policies with inflation protection. The 'All' row corresponds to that shown in Exhibit II. Values in the table are shown in millions of dollars.

58%/85% Test by Series for Policies with Inflation Protection

Series	Item 5[1]	Item 7[2]	Result[3]
All	$112.9	$165.5	Pass
515	92.1	136.5	Pass
700	5.8	7.6	Pass
780	15.0	21.4	Pass

[1] Item 5 is the Lifetime Earned Premium Times Prescribed Factor.
[2] Item 7 is Lifetime Incurred Claims with Rate Increase.
[3] Test of whether Item 7 is not less than Item 5.

15. Actual-to-Expected Experience

The following table provides a comparison of actual and projected experience using current assumptions to that expected using original pricing assumptions. Values in the following table are shown (a) before and (b) after the requested rate increase.

Actual and Expected Loss Ratios by Series for Policies with Inflation Protection

	Lifetime Loss Ratio			Actual-to-Expected	
Series	Before Increase	After Increase	Expected	Before Increase	After Increase
All	90%	75%	60%	1.50	1.25
515	93	78	61	1.53	1.27
700	84	65	55	1.52	1.17
780	73	66	56	1.31	1.17

Actual and projected experience in the above table is identical to that described in Exhibit I, except uses the current most-likely interest rate assumption of 5.00%.

Expected experience uses the actual policies sold and projects from issue on a seriatim basis using the original pricing assumptions for each series or, if not available, the original pricing assumptions from another policy form that was priced during a similar era.

Exhibit III provides a comparison of the current and original pricing assumptions that underlie the actual and expected experience described above.

16. History of Previous Rate Revisions

There have been no previous rate revisions on the 515 Series form in Virginia.

Nationwide, there has been one prior rate increase request on the 515 Series block of business, which began in December 2013. Departments of insurance filed these increases for use between 2013 and 2016. On average, a cumulative increase of 26% has been filed for use on the 515 Series forms with inflation protection. There have been no prior rate increases on the 700 and 780 Series.

The company anticipates requesting an actuarially equivalent cumulative rate increase level for policies with inflation protection in all jurisdictions, except where it is not practical to file due to the limited amount of in-force business or regulatory requirements. Because a prior increase has been requested on the 515 Series, the requested rate increase for this current round of rate filings may vary across jurisdictions, with larger increases being requested in jurisdictions that have approved smaller increases in the past. The company expects to continue filing, to the extent practical, in jurisdictions that approve less than the requested amount for the current round of rate filings. As a result of these follow-up rate filings, any material rate differences would only be temporary until the company is able to file for actuarially equivalent rates in states that approve less than what was initially requested.

17. Analysis Performed to Consider a Rate Increase

The experience table in Section 15 above demonstrates that experience has been more adverse from that expected using original pricing assumptions as the A:E loss ratios exceed 1.0. The adverse experience is due to a combination of higher persistency and lower interest.

Exhibit IV provides a comparison of actual and projected nationwide experience to that expected in pricing with respect to morbidity, mortality, lapse, interest, and improvement. Please note that to isolate the impact of each changed assumption from pricing, the experience in Exhibit IV has been restated to reflect no prior rate increases.

For the business subject to rate stability regulation, an analysis of the projected loss ratio compared to that assumed at the time of original pricing revealed that experience has unfolded more than moderately adverse and crossed the original pricing threshold for which the company could consider a rate increase.

Documentation of the original pricing definition for moderately adverse experience (MAE) is not explicitly stated for all products. However, the original pricing documentation for the 700 and 780 Series states that margin of 10% was included in determining statutory contract reserves. This definition of

margin is consistent with the MAE definition used by MedAmerica for similar products priced around the same time as the 515, 700, and 780 Series. Therefore, the assumed original pricing threshold before which a rate increase may be considered is a 10% increase in the original pricing lifetime loss ratio. Section 15 demonstrates that the lifetime loss ratios are well in excess of this assumed original pricing threshold (i.e., before increase A:E exceeds 1.10).

18. Requested Rate Increase

The company is requesting a rate increase that varies by inflation option. The company is seeking this current rate increase request to help alleviate the poor performance on this block of business.

The cumulative rate increase levels were determined to vary by series and inflation option to better align the rate increase with the adverse experience. No rate increase is being requested on policies without inflation protection. MedAmerica's goal is equity across all jurisdictions, to the extent practical. The rate increase was determined in such a way that minimizes subsidization across jurisdictions due to differences in the previously filed rate increases.

Although a larger rate increase is currently supportable, the table below provides the cumulative increase for policies with inflation protection for each series, as well as the average cumulative prior increase and resulting current requested premium rate increase based on the nationwide distribution of business as of December 31, 2016.

Nationwide[1] Average Rate Increase Request for Policies with Inflation Protection

Series	Cumulative Prior Increase	Current Requested Increase	Cumulative Increase
515	26.3%	82.1%	130%
700	0.0	100.0	100
780	0.0	35.0	35
Average	19.3	75.1	109

[1] See the October 25 response letter for the Virginia-specific rate increase request.

The cumulative rate increases for policies with inflation protection were determined such that the business would break even with margin going forward (i.e., 0% profit margin).

Cumulative rate increases of 420% for 515, 200% for 700, and 105% for 780 are needed on average nationwide to restore the lifetime performance of this block to the original pricing expectation and certify that rates will remain stable under moderately adverse conditions. While the company does not currently anticipate additional rate increases, it will continue to monitor the business and reserves the right to request additional rate increases in the future.

Corresponding rate tables reflecting the current and proposed rate increases for policy forms affected by this rate increase are enclosed with this filing. Please note that the actual rates implemented may vary from those in the enclosed rate tables slightly due to implementation rounding algorithms.

As the company is not currently marketing new business, the required statement that the renewal premium rate schedules are not greater than the new business premium rate schedules is not applicable.

19. Average Annual Premium in Virginia (Based on December 31, 2016 In-Force)

The number of insureds and the corresponding average annual premium that will be affected by this rate increase filing and the identical concurrent filing are:

515 Series with Virginia-Specific Requested Increase

Issue Date	Inflation Protection Option	Number of Insureds	Before Increase Premium	After Increase Premium[1]
MedAmerica				
Prior to 10/1/2003	None	56	$1,001	$1,001
	Compound	73	1,138	2,618
On or After 10/1/2003	None	3	751	751
	Compound	15	1,126	1,126
CICA				
Prior to 10/1/2003	None	5	$1,083	$1,083
	Compound	13	1,327	3,053
On or After 10/1/2003	None	0	0	0
	Compound	6	1,110	1,110

[1] The after increase premium reflects the Virginia-specific rate increase request of 130% for policies with inflation protection issued prior to October 1, 2003 and 0% for all other policies.

20. Proposed Effective Date

This rate increase will apply to policies on their next premium payment date following at least a 75-day policyholder notification period following being filed for use by the department of insurance.

21. Distribution of Business as of December 31, 2016 (Based on Nationwide In-Force Insured Count for Policies with Inflation Protection)

Issue Ages	Percent Distribution
<40	2%
40-44	4
45-49	5
50-54	14
55-59	20
60-64	32
65-69	20
70-74	3
75+	<1

Elimination Period	Percent Distribution
20-Day	15%
30-Day	5
60-Day	4
90-Day	73
180-Day	3

Benefit Period	Percent Distribution
400 Days	7%
800 Days	17
1200 Days	33
1600 Days	21
Lifetime	22

Coverage Type	Percent Distribution
Facility Only	<1%
Comprehensive	99
Home Health Only	1

22. Number of Insureds and Annualized Premium (Based on December 31, 2016 In-Force)

The number of insureds and annualized premium that will be affected by this rate increase filing and the identical concurrent filing are:

Virginia – MedAmerica

Series	Inflation Protection Option	Number of Insureds	Annualized Premium
Issued Prior to 10/1/2003			
515	None	56	$56,054
	Compound	73	83,102
Issued On or After 10/1/2003			
515	None	3	$2,254
	Compound	15	16,896

Virginia – CICA

Series	Inflation Protection Option	Number of Insureds	Annualized Premium
Issued Prior to 10/1/2003			
515	None	5	$5,415
	Compound	13	17,255
Issued On or After 10/1/2003			
515	None	0	$0
	Compound	6	6,660

MEDAMERICA INSURANCE COMPANY

Address: 165 Court Street, Rochester, New York 14647

Actuarial Memorandum

November 12, 2019

Nationwide – MedAmerica, CICA, and CLICNY

Series	Inflation Protection Option	Number of Insureds	Annualized Premium
Issued Prior to 10/1/2003			
515	None	1,655	$1,965,234
	Compound	2,103	3,183,274
700	None	115	118,543
	Compound	167	239,728
780	None	6	8,661
	Compound	23	40,350
Total		4,069	5,555,790
Issued On or After 10/1/2003			
515	None	301	$371,553
	Compound	365	563,563
700	None	19	18,937
	Compound	17	20,848
780	None	1,035	1,009,119
	Compound	522	777,977
Total		2,259	2,761,997

MEDAMERICA INSURANCE COMPANY

Address: 165 Court Street, Rochester, New York 14647

Actuarial Memorandum

November 12, 2019

23. Actuarial Certification

I am a Principal and Consulting Actuary for Milliman, Inc. and retained by MedAmerica to render an opinion with regard to long-term care insurance rates. I am a member of the American Academy of Actuaries. I meet the Academy's qualification standards to render this actuarial opinion and am familiar with the requirements for filing long-term care insurance premiums and rate increases.

This memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice, including Actuarial Standards of Practice No. 8, "Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health Benefits" and 18, "Long-Term Care Insurance".

I hereby certify that, to the best of my knowledge and judgment, this rate submission is in compliance with the applicable laws and regulations of this jurisdiction and the rules of the department of insurance, including the provisions of 14VAC5-200-150 and 14VAC5-200-153.

In my opinion, the rates are not excessive or unfairly discriminatory, and bear reasonable relationship to the benefits based on the loss ratio standards of this jurisdiction.

If a cumulative premium rate schedule increase of 420% for 515 Series, 200% for 700 Series, and 105% for 780 Series is implemented for policies with inflation protection and the underlying assumptions, with moderately adverse conditions reflected, are realized, no further premium rate schedule increases are anticipated.

In forming my opinion, I have used actuarial assumptions and actuarial methods (which gave consideration to policy design, underwriting, and claim adjudication) and such tests of the actuarial calculations as I considered necessary. Based on these assumptions, or statutory requirements where necessary, the premium rate filing is in compliance with the loss ratio standards of this jurisdiction.

I have relied on data and information provided by MedAmerica to develop this memorandum, including but not limited to management's view of when a rate change may be considered, policy design, underwriting and claim adjudication process, seriatim in-force data, claim data, and the company's long-term earnings rate. I have not audited or independently verified the data and information provided, but have reviewed it for reasonableness.

The basis for contract reserves has been previously filed and there is no anticipation of any changes.

Missy Gordon

Missy Gordon, FSA, MAAA
Principal and Consulting Actuary

Date: November 12, 2019

Exhibit I-a
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Before Requested Rate Increase
515, 700, and 780 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	544	0	0%	10	0%
	1998	160,240	0	0%	302	0%
	1999	746,300	0	0%	1,149	0%
	2000	1,891,437	166,207	9%	1,997	6%
	2001	3,097,755	145,833	5%	3,186	5%
	2002	4,464,093	173,328	4%	4,127	5%
	2003	5,100,175	185,832	4%	4,373	4%
	2004	5,303,838	546,341	10%	4,451	6%
	2005	5,436,526	1,457,112	27%	4,563	10%
	2006	5,888,002	860,790	15%	4,938	11%
	2007	6,300,977	823,352	13%	4,975	11%
	2008	6,238,914	944,219	15%	4,736	11%
	2009	5,876,128	1,928,368	33%	4,419	13%
	2010	5,540,109	1,611,156	29%	4,225	15%
	2011	5,293,586	2,579,836	49%	4,056	17%
	2012	5,083,404	2,257,047	44%	3,913	19%
	2013	4,887,563	2,960,276	61%	3,787	21%
	2014	4,698,342	2,589,151	55%	3,535	22%
	2015	4,706,947	2,636,903	56%	3,335	24%
	2016	4,742,478	3,596,163	76%	3,197	26%
Projected Future Experience (50 Years)	2017	4,632,214	3,866,730	83%	3,062	28%
	2018	4,452,224	4,347,930	98%	2,925	30%
	2019	4,256,216	4,835,210	114%	2,786	32%
	2020	4,030,629	5,317,443	132%	2,646	35%
	2021	3,798,661	5,799,292	153%	2,504	37%
	2022	3,565,913	6,292,841	176%	2,362	40%
	2023	3,333,473	6,799,641	204%	2,219	43%
	2024	3,102,500	7,300,934	235%	2,077	46%
	2025	2,874,302	7,786,975	271%	1,936	49%
	2026	2,650,199	8,238,997	311%	1,797	52%
	2027	2,431,484	8,634,450	355%	1,660	54%
	2028	2,219,483	8,962,490	404%	1,528	57%
	2029	2,015,494	9,210,462	457%	1,399	60%
	2030	1,820,763	9,363,898	514%	1,276	63%
	2031	1,636,352	9,427,259	576%	1,158	66%
	2032	1,462,867	9,467,115	647%	1,046	69%
	2033	1,300,592	9,495,007	730%	940	71%
	2034	1,149,954	9,451,290	822%	841	74%
	2035	1,011,377	9,323,406	922%	749	76%
	2036	885,026	9,126,611	1,031%	665	78%
	2037	770,729	8,870,906	1,151%	587	80%
	2038	668,073	8,569,474	1,283%	516	82%
	2039	576,482	8,236,755	1,429%	452	84%
	2040	495,318	7,865,610	1,588%	394	86%
	2041	423,880	7,464,865	1,761%	343	87%
	2042	361,325	7,038,212	1,948%	297	89%
	2043	306,798	6,588,982	2,148%	256	90%
	2044	259,500	6,134,975	2,364%	220	91%
	2045	218,678	5,678,814	2,597%	189	92%
	2046	183,602	5,230,617	2,849%	161	93%
	2047	153,657	4,795,206	3,121%	138	94%
	2048	128,180	4,377,524	3,415%	117	94%
	2049	106,594	3,987,685	3,741%	99	95%
	2050	88,407	3,623,908	4,099%	84	95%
	2051	73,149	3,278,301	4,482%	71	96%
	2052	60,377	2,952,136	4,889%	59	96%
	2053	49,738	2,648,508	5,325%	50	97%
	2054	40,895	2,367,759	5,790%	42	97%
	2055	33,567	2,114,287	6,299%	35	97%
	2056	27,510	1,880,077	6,834%	29	97%
	2057-2061	77,526	6,389,523	8,242%	85	98%
	2062-2066	26,208	2,893,072	11,039%	31	98%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	124,830,293	32,322,684	26%
Future	41,033,441	130,616,156	318%
Lifetime	165,863,734	162,938,841	98%

Exhibit I-b
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience After Requested Rate Increase
515, 700, and 780 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	544	0	0%	10	0%
	1998	160,240	0	0%	302	0%
	1999	746,300	0	0%	1,149	0%
	2000	1,891,437	166,207	9%	1,997	6%
	2001	3,097,755	145,833	5%	3,186	5%
	2002	4,464,093	173,328	4%	4,127	5%
	2003	5,100,175	185,832	4%	4,373	4%
	2004	5,303,838	546,341	10%	4,451	6%
	2005	5,436,526	1,457,112	27%	4,563	10%
	2006	5,888,002	860,790	15%	4,938	11%
	2007	6,300,977	823,352	13%	4,975	11%
	2008	6,238,914	944,219	15%	4,736	11%
	2009	5,876,128	1,928,368	33%	4,419	13%
	2010	5,540,109	1,611,156	29%	4,225	15%
	2011	5,293,586	2,579,836	49%	4,056	17%
	2012	5,083,404	2,257,047	44%	3,913	19%
	2013	4,887,563	2,960,276	61%	3,787	21%
	2014	4,698,342	2,589,151	55%	3,535	22%
	2015	4,706,947	2,636,903	56%	3,335	24%
	2016	4,742,478	3,596,163	76%	3,197	26%
Projected Future Experience (50 Years)	2017	4,632,214	3,866,730	83%	3,062	28%
	2018	4,733,437	4,282,010	90%	2,803	30%
	2019	6,010,450	4,375,114	73%	2,543	32%
	2020	6,073,568	4,710,842	78%	2,405	33%
	2021	5,743,232	5,125,907	89%	2,277	35%
	2022	5,384,680	5,554,881	103%	2,148	37%
	2023	5,027,074	5,994,644	119%	2,019	39%
	2024	4,672,216	6,428,888	138%	1,890	41%
	2025	4,322,134	6,848,945	158%	1,762	43%
	2026	3,978,862	7,238,910	182%	1,636	45%
	2027	3,644,396	7,579,571	208%	1,512	48%
	2028	3,320,787	7,861,718	237%	1,392	50%
	2029	3,010,032	8,074,578	268%	1,275	52%
	2030	2,714,026	8,205,658	302%	1,163	54%
	2031	2,434,364	8,258,858	339%	1,056	56%
	2032	2,171,923	8,292,092	382%	954	58%
	2033	1,927,066	8,315,270	431%	858	60%
	2034	1,700,345	8,275,349	487%	768	62%
	2035	1,492,305	8,161,906	547%	684	64%
	2036	1,303,094	7,988,543	613%	607	66%
	2037	1,132,349	7,764,441	686%	536	67%
	2038	979,361	7,501,093	766%	472	69%
	2039	843,182	7,211,091	855%	413	70%
	2040	722,783	6,888,002	953%	361	72%
	2041	617,051	6,539,503	1,060%	314	73%
	2042	524,680	6,168,905	1,176%	272	74%
	2043	444,362	5,778,965	1,301%	235	75%
	2044	374,868	5,384,520	1,436%	202	76%
	2045	315,049	4,988,151	1,583%	173	76%
	2046	263,788	4,598,581	1,743%	148	77%
	2047	220,150	4,219,890	1,917%	126	78%
	2048	183,129	3,856,451	2,106%	107	78%
	2049	151,854	3,517,158	2,316%	91	79%
	2050	125,584	3,200,529	2,549%	77	79%
	2051	103,612	2,899,140	2,798%	65	80%
	2052	85,275	2,614,503	3,066%	55	80%
	2053	70,050	2,349,252	3,354%	46	80%
	2054	57,433	2,103,396	3,662%	38	80%
	2055	47,015	1,880,951	4,001%	32	81%
	2056	38,428	1,674,593	4,358%	27	81%
	2057-2061	107,643	5,702,742	5,298%	79	81%
	2062-2066	36,161	2,582,516	7,142%	29	81%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	124,830,293	32,322,684	26%
Future	57,034,617	115,828,589	203%
Lifetime	181,864,910	148,151,273	81%

Exhibit II
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience with Prior Approved Increases
515, 700, and 780 Series with Inflation Protection

1	Accumulated value of initial earned premium	123,825,483	x	58%	=	71,818,780
2a	Accumulated value of earned premium	124,830,293				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	1,004,810	x	85%	=	854,088
3	Present value of future projected initial earned premium	30,441,343	x	58%	=	17,655,979
4a	Present value of future projected premium	57,034,617				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	26,593,274	x	85%	=	22,604,283
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**112,933,130**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					32,322,684
6b	Present value of future projected incurred claims without the inclusion of active life reserves					133,202,878
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**165,525,562**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Exhibit III
MedAmerica, CICA, and CLICNY
Comparison of Current and Original Pricing Assumptions

		Morbidity
Current Assumptions	**All CICA**	Expected claim costs are developed using the 2014 Milliman *Long-Term Care Guidelines (Guidelines)* with adjustments for underwriting selection and an all-lives exposure basis. The claim costs are further adjusted based on historical claim experience by policy form group, attained age, duration, and coverage type, to the extent credible. Two years of retrospective improvement was applied to bring these assumptions forward to 2016 using scalars of 0.980 for females and 0.970 for males.
Original Assumptions	**All CICA**	The pricing claim costs were developed from the 1997 *Guidelines*. All values were adjusted to reflect the effects of the nature of the benefits, the elimination periods, policy maximums, and the eligibility standards. The claim costs include factors to adjust them to an all-lives exposure base. These claim costs do not necessarily represent the original pricing claim costs because MedAmerica did not receive the original pricing claim costs at the time of acquisition. These claim costs are a reasonable proxy of the original pricing claim costs based on a reproduction of the original pricing lifetime loss ratio.

		Mortality
Current Assumptions	**All CICA**	1994 Group Annuitant Mortality (GAM) Static gender-distinct table with 22 years of retrospective improvement applied to bring this table forward to 2016 using scalars of 0.896 for females and 0.802 for males. These mortality rates are further adjusted based on historical mortality experience by issue age band and duration. Tables providing these adjustment factors are provided in Section 5 of the actuarial memorandum.
Original Assumptions	**515 Series and 700 Series Not Issued in Florida**	Ultimate mortality level of 95% of U.S. Life Mortality (79-81). While the original pricing selection factors were not available, selection factors grading from 50% to 95% over the first 10 durations were assumed.
	700 Series Issued in Florida and 780 Series	1983 GAM Table without selection.

		Lapse Rates
Current Assumptions	**All CICA**	Voluntary lapse rates (excludes benefit expiry) vary by policy duration and policy form cohort.

Lapse Rate Assumptions

Duration	515 Series	700 Series	780 Series
7	6.0%	3.5%	3.5%
8	4.0%	3.0%	3.0%
9	3.0%	2.5%	2.5%
10	3.0%	1.5%	1.5%
11	2.0%	1.5%	1.5%
12+	2.0%	1.5%	1.5%

Exhibit III
MedAmerica, CICA, and CLICNY
Comparison of Current and Original Pricing Assumptions

Original Assumptions

Lapse Rates

Lapse rates vary by policy form series, duration, and issue age.

515 Series

	515 Series (Not Issued in New York)							515 Series (Issued in New York)						
	Issue Age							Issue Age						
Duration	<55	55-59	60-64	65-69	70-74	75-79	80+	<55	55-59	60-64	65-69	70-74	75-79	80+
1	20.00%	18.00%	18.00%	18.00%	14.00%	12.00%	10.00%	20.00%	18.00%	16.00%	14.00%	12.00%	10.00%	10.00%
2	16.00%	15.00%	15.00%	15.00%	12.00%	10.00%	8.00%	15.00%	14.00%	12.00%	10.00%	8.00%	6.00%	6.00%
3	13.00%	12.00%	12.00%	12.00%	10.00%	9.00%	7.00%	10.00%	10.00%	9.00%	6.00%	6.00%	4.00%	4.00%
4	11.00%	10.00%	10.00%	10.00%	9.00%	8.00%	7.00%	8.00%	8.00%	6.00%	5.00%	4.00%	3.00%	3.00%
5	10.00%	9.00%	9.00%	9.00%	8.00%	7.00%	6.00%	6.00%	6.00%	4.00%	4.00%	3.00%	3.00%	3.00%
6	10.00%	9.00%	8.00%	8.00%	7.00%	7.00%	6.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
7	10.00%	9.00%	8.00%	7.00%	6.00%	6.00%	5.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
8	9.00%	8.00%	8.00%	7.00%	6.00%	6.00%	5.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
9	9.00%	8.00%	7.00%	7.00%	5.00%	5.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
10	9.00%	8.00%	7.00%	6.00%	5.00%	5.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
11	8.00%	8.00%	7.00%	6.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
12	8.00%	7.00%	6.00%	6.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
13	8.00%	7.00%	6.00%	5.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
14	7.00%	7.00%	6.00%	5.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
15	7.00%	6.00%	6.00%	5.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
16	6.00%	6.00%	6.00%	4.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
17	6.00%	6.00%	5.00%	4.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
18	5.00%	5.00%	5.00%	4.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
19	5.00%	5.00%	5.00%	4.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%
20+	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	5.00%	5.00%	4.00%	4.00%	3.00%	3.00%	3.00%

700 Series

	700 Series (Not Issued in Florida)							700 Series (Issued in Florida)						
	Issue Age							Issue Age						
Duration	<55	55-59	60-64	65-69	70-74	75-79	80+	<55	55-59	60-64	65-69	70-74	75-79	80+
1	20.00%	18.00%	18.00%	18.00%	14.00%	12.00%	10.00%	20.00%	18.00%	18.00%	18.00%	14.00%	12.00%	10.00%
2	16.00%	15.00%	15.00%	15.00%	12.00%	10.00%	8.00%	16.00%	15.00%	15.00%	15.00%	12.00%	10.00%	8.00%
3	13.00%	12.00%	12.00%	12.00%	10.00%	9.00%	7.00%	13.00%	12.00%	12.00%	12.00%	10.00%	9.00%	7.00%
4	11.00%	10.00%	10.00%	10.00%	9.00%	8.00%	7.00%	11.00%	10.00%	10.00%	10.00%	9.00%	8.00%	7.00%
5	10.00%	9.00%	9.00%	9.00%	8.00%	7.00%	6.00%	10.00%	9.00%	9.00%	9.00%	8.00%	7.00%	6.00%
6	10.00%	9.00%	8.00%	8.00%	7.00%	7.00%	6.00%	10.00%	9.00%	8.00%	8.00%	7.00%	7.00%	6.00%
7	10.00%	9.00%	8.00%	7.00%	6.00%	6.00%	5.00%	10.00%	9.00%	8.00%	7.00%	6.00%	6.00%	5.00%
8	9.00%	8.00%	8.00%	7.00%	6.00%	6.00%	5.00%	9.00%	8.00%	8.00%	7.00%	6.00%	6.00%	5.00%
9	9.00%	8.00%	7.00%	7.00%	5.00%	5.00%	4.00%	9.00%	8.00%	7.00%	7.00%	5.00%	5.00%	4.00%
10	9.00%	8.00%	7.00%	6.00%	5.00%	5.00%	4.00%	9.00%	8.00%	7.00%	6.00%	5.00%	5.00%	4.00%
11	8.00%	8.00%	7.00%	6.00%	4.00%	4.00%	4.00%	8.00%	8.00%	7.00%	6.00%	4.00%	4.00%	4.00%
12	7.00%	7.00%	6.00%	6.00%	4.00%	4.00%	4.00%	7.00%	7.00%	6.00%	6.00%	4.00%	4.00%	4.00%
13	6.00%	6.00%	6.00%	5.00%	4.00%	4.00%	4.00%	6.00%	6.00%	6.00%	5.00%	4.00%	4.00%	4.00%
14	5.00%	5.00%	5.00%	5.00%	4.00%	4.00%	4.00%	5.00%	5.00%	5.00%	5.00%	4.00%	4.00%	4.00%
15+	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	3.00%	3.00%	3.00%

780 Series

	780 Series						
	Issue Age						
Duration	<55	55-59	60-64	65-69	70-74	75-79	80+
1	17.00%	15.00%	15.00%	15.00%	12.00%	10.00%	8.00%
2	13.00%	12.00%	12.00%	12.00%	10.00%	8.00%	6.00%
3	11.00%	10.00%	10.00%	10.00%	8.00%	8.00%	6.00%
4	10.00%	9.00%	9.00%	9.00%	8.00%	7.00%	6.00%
5	9.00%	8.00%	8.00%	8.00%	7.00%	6.00%	5.00%
6	10.00%	9.00%	8.00%	8.00%	7.00%	7.00%	6.00%
7	10.00%	9.00%	8.00%	7.00%	6.00%	6.00%	5.00%
8	8.00%	7.00%	7.00%	6.00%	5.00%	5.00%	4.00%
9	9.00%	8.00%	7.00%	7.00%	5.00%	5.00%	4.00%
10	9.00%	8.00%	7.00%	6.00%	5.00%	5.00%	4.00%
11	7.00%	7.00%	6.00%	5.00%	3.00%	3.00%	3.00%
12	7.00%	7.00%	6.00%	6.00%	4.00%	4.00%	4.00%
13	5.00%	5.00%	5.00%	4.00%	3.00%	3.00%	3.00%
14	4.00%	4.00%	4.00%	4.00%	3.00%	3.00%	3.00%
15+	3.00%	3.00%	3.00%	3.00%	2.00%	2.00%	2.00%

Exhibit III
MedAmerica, CICA, and CLICNY
Comparison of Current and Original Pricing Assumptions

		Benefit Expiry Rates
Current Assumptions	**All CICA**	Benefit expiry rates reflect assumed policy termination due to exhaustion of benefits on limited benefit period policies. The rates are based on the 2014 *Guidelines* with adjustments for historical benefit expiry experience and vary by gender, benefit period, and attained age. A table containing the benefit expiry rates is provided in Section 5 of the actuarial memorandum.
Original Assumptions	**All CICA**	Benefit expiry was not separated from the lapse assumption.

		Interest Rate
Current Assumptions	**All CICA**	5.00%
Original Assumptions	**515 Series and 700 Series**	6.00%
	780 Series	5.50%

		Improvement
Current Assumptions	**All CICA**	Annual improvement in the mortality and morbidity assumptions is assumed for 15 years starting in 2017. Annual mortality improvement is assumed to be 0.5% and 1.0% for females and males, respectively. Annual morbidity improvement is assumed to be 1.0% and 1.5% for females and males, respectively.
Original Assumptions	**All CICA**	No mortality or morbidity improvement was assumed.

Exhibit IV
MedAmerica, CICA, and CLICNY
Nationwide Experience Restated to No Prior Rate Increases
Impact of Changing from Pricing to Current Assumptions
515, 700, and 780 Series with Inflation Protection

Scenario	Lifetime Loss Ratio	Incremental Impact on the Lifetime Loss Ratio[1]	Increase Needed[2]
Original Pricing Assumptions	60%	N/A	N/A
Historical Experience through 2016 & Projections with Pricing Assumptions	70%	17%	153%
Historical Experience through 2016 & Projections with Pricing Assumptions except for Current:			
Interest	79%	12%	94%
Interest & Lapse	90%	14%	98%
Interest & Lapse & Mortality	111%	24%	144%
Interest & Lapse & Mortality & Morbidity	98%	-12%	-70%
Interest & Lapse & Mortality & Morbidity & Improvement	92%	-6%	-36%
Historical Experience through 2016 & Projections with All Current Most Likely Assumptions[3]	92%	53%	311%

[1] Calculated as the ratio of the lifetime loss ratio in a given row to that in the row immediately above it less one.

[2] These rows show the rate increase needed to reproduce the lifetime loss ratio in the row immediately above it. Calculated without regard to CBUL, RBO, adverse selection, and higher waiver claims due to the needed rate increase.

[3] This row is calculated in regards to the pricing lifetime loss ratio of 60%.

Appendix A
Development and Justification of Current Assumptions

The assumptions for mortality, voluntary lapse, benefit expiry, and morbidity were developed by Milliman based on historical experience on the policies originally issued by Combined Insurance Company of America and Combined Life Insurance Company of New York (collectively, CICA), which MedAmerica Insurance Company (MedAmerica) acquired from Ace Ltd. in 2008. Where actual experience had low credibility or did not exist, we considered experience on other series originally issued by CICA and MedAmerica or industry experience. For persistency, policy termination experience through December 31, 2015 was used. For morbidity, claim experience through December 31, 2014 was used. The methodology used to develop these assumptions is provided below.

Persistency

The assumptions for mortality and voluntary lapse were developed based on detailed historical experience through December 31, 2015 for MedAmerica's organic (including affinity partners) and acquired business. For the acquired business, experience prior to acquisition was excluded as it predates MedAmerica's administration of the block.

The benefit expiry assumption was developed using the 2014 Milliman *Long-Term Care Guidelines (Guidelines)* with adjustments based on MedAmerica's actual benefit expiry experience through December 31, 2015 on its organic business.

Mortality Durational Factors for Individual Policies

Exhibit A-1a supports the individual business mortality assumption and provides the following information for all companies and products (both individual and group) combined, but separately for issue age bands (i) 75 and older, (ii) 70 to 74, (iii) 65 to 69, and (iv) 60 to 64:

- Exposure that reflects a full year of exposure for each death and the length of time a covered life is exposed to the risk of death during the year for each life that does not die.
- Mortality rates for actual, expected, and an additional standard table for comparison. All of these rates were brought forward to 2015 for consistency with the basis of the expected table by applying mortality improvement factors that reflect annual improvement of 0.5% for females and 1.0% for males.

  Actual mortality rates equal the number of deaths divided by exposure. The number of deaths includes a scalar to capture improvement between the year of death and 2015. For example, if 10 males died in 2010, then the number of deaths (10) would be multiplied by 5 years of improvement (0.951).

  2015GAM mortality rates equal 94GAM with 21 years of improvement, which results in scalars of 0.900 for females and 0.810 for males. These are the expected mortality rates to which the factors in Section 5 of the actuarial memorandum are applied.

  2015IAM is equal to 2012 Individual Annuity Mortality Period (2012IAM) standard table mortality rates with 3 years of improvement (scalars of 0.985 for females and 0.970 for males).
- Ratios of actual and standard table mortality rates to the 2015GAM expected (A:E) mortality rates.
- Credibility percentage based on the number of deaths (with improvement scalars described above) and the credibility measure described at the end of this appendix.
- A:E ratio that is credibility weighted with the two standard table options for a complement.
- Smoothed durational factors that correspond to that shown in Section 5 of the actuarial memorandum.

We developed the smoothed factors by issue age band and duration. We started with the older issue ages to develop an ultimate factor and then worked backward to younger issue age bands, making experience adjustments for the first 20 durations. In developing these experience adjustments, we considered the A:E ratios, level of credibility, whether in the select or ultimate period, and A:E credibility-weighted ratios.

An ultimate level of 105% of 2015GAM was assumed based on the combined experience of issue ages 70 and older for attained ages older than 95 to the extent credible. For the first 20 durations, the factors were pegged for the mid-point of a quinquennial durational band and then interpolated in between to develop smoothed factors. The smoothed factors were determined such that the bands of quinquennial durations reproduced the actual experience, to the extent credible.

Theoretical adjustments are made, following the diagonal, according to the adjustments made for older issue age bands to maintain mortality relationships across attained ages. For example, we assume an 85% factor for attained

age 80, which appears in duration 18 for issue age 62 and duration 23 for issue age 57 as shown in Section 5 of the actuarial memorandum; following along this diagonal the assumption is consistent.

Exhibit A-1b provides similar information as Exhibit A-1a for individual business only with issue ages under 60. For development of the mortality assumption for issue ages under 60, the experience was split between individual and group because there is a material amount of group experience under 60. Mortality can differ between individual and group business because of adverse selection associated with group underwriting.

Voluntary Lapse Rates

Exhibit A-2a provides total exposure, composite termination rates, expected mortality rates, derived voluntary lapse rates, credibility percent, and smoothed voluntary lapse rates for 515 Series policies by duration. Exhibit A-2b provides similar information for combined 700 and 780 Series policies. We removed experience prior to acquisition of this block. This results in certain early durations having no or minimal experience. As all in-force policies are in duration 7 or later, we exclude durations 1-6 from Exhibits A-2a and A-2b.

In general, the smoothed voluntary lapse rates were set in such a way that the combined duration smoothed rates were close to the derived voluntary lapse rates (see the rows at the bottom of the exhibits). In developing the ultimate voluntary lapse rate, the level of credibility of the actual voluntary lapse experience and the experience of other form groups were considered, as applicable. The degree of closeness of the smoothed voluntary lapse rate compared to actual experience depends on the level of credibility.

The actual composite (mortality and voluntary lapse) termination rates were calculated by duration as follows:

$$\text{Annualized Composite Termination Rate} = \frac{\text{Number of Deaths and Voluntary Lapses during the Year}}{\text{Number of Lives Exposed during the Year}}.$$

A death or voluntary lapse (excluding benefit expiry) was assigned to the duration in which it occurred, or the preceding duration, if the termination was on the anniversary date. Each death or voluntary lapse contributes 1.0 to the numerator and a full year to the denominator. For lives whose benefits expire or do not terminate, the number of lives exposed to termination is based on the length of time a covered life is exposed to the risk of termination due to death or voluntary lapse during the year. This calculation logic is consistent with that used in the LTC Insurance Persistency Experience reports sponsored by LIMRA International and the SOA LTC Experience Committee.

The expected mortality rate assumes the gender-distinct 2015GAM table with the durational factors shown in Section 5 of the actuarial memorandum applied by duration.

The derived voluntary lapse rate is then calculated according to the following formula:

$$\text{Derived Voluntary Lapse Rate} = 1 - \frac{1 - \text{Composite Termination Rate}}{1 - \text{Expected Mortality Rate}}.$$

Benefit Expiry

Benefit expiry rates reflect assumed policy lapses due to exhaustion of benefits based on the 2014 *Guidelines* with adjustments for historical benefit expiry experience and vary by attained age, gender, and benefit period. Policies with lifetime benefits do not have an expiry assumption (i.e., rate of 0%).

We compared MedAmerica's actual benefit expiry experience through December 31, 2015 to that expected by the 2014 *Guidelines*. We developed adjustment factors by attained age based on the experience of a subset of MedAmerica's organic business. Factors were developed by quinquennial attained age band and then interpolated to produce scalars for each attained age. These scalars were then applied to the benefit expiry rates developed by the 2014 *Guidelines* in order to produce the final benefit expiry assumptions shown in Section 5 of the actuarial memorandum.

Exhibit A-3 provides exposure, actual and expected benefit expiry rates, A:E ratios, credibility percent, credibility-weighted A:E ratios, and smoothed adjustment factors. The exposure used reflects a full year of exposure for each benefit expiry and the length of time a covered life is exposed to the risk of benefit expiry during the year for each life that does not expire benefits.

Appendix A
Development and Justification of Current Assumptions

Morbidity

The claim costs were developed using the 2014 *Guidelines*. A:E experience analyses were performed to develop most likely (with no explicit margin) morbidity experience adjustments to be applied to the 2014 *Guidelines* claim costs. The experience used includes historical experience for all products of MedAmerica, its affinity partners, and any acquired business from 2004 through 2014, with runout through June 2015. The claim costs were then further adjusted based on historical claim experience by policy duration, attained age, and coverage-type, to the extent credible.

Because MedAmerica elected to invest in updating its underlying claim costs from original pricing to 2014 *Guidelines* for all policy forms, a consistent underlying expected claim cost basis (which captures differences in policy/benefit design by product) was available, so we were able to aggregate MedAmerica's experience across all policy forms to create significantly more credible experience adjustments. Adjustments were still made based on CICA-specific experience; however, to the extent that it was not credible, it was complemented with the experience on MedAmerica's other policy forms, and where that experience is not fully credible, the 2014 *Guidelines*.

A:E adjustment factors were developed using a complex and proprietary Excel-based model. Adjustments were developed by the following parameters: policy duration, attained age, coverage type, group/individual, benefit payment type, company, and product. The adjustment factors were calculated using an algorithm that simultaneously and iteratively updates the adjustment factors until the adjusted expected incurred claims match actual incurred claims, to the extent credible. The adjusted expected incurred claims equal the 2014 *Guidelines* (with adjustments for historical improvement) multiplied by the A:E adjustment factors. The iterative process normalizes the adjustments for each parameter because the adjusted expected incurred claims capture the adjustments made for the other characteristics and thus normalizes the underlying mix differences.

Exhibit A-4a provides separate A:E adjustment factors for the 515 Series, 700 Series, and 780 Series blocks after multiplying the appropriate combination of factors for policy duration, attained age, and coverage type.

Exhibit A-4b provides an indication of the goodness of fit for each product. Exhibit A-4b provides the credibility and ratio of actual-to-adjusted expected incurred claims by policy duration band and attained age band. The credibility and ratio's numerator (actual incurred claims) reflects the 515 Series and combined 700/780 Series blocks' separate experience. The ratio's denominator (adjusted expected incurred claims) is equal to the unadjusted expected incurred claims (2014 *Guidelines*) multiplied by the A:E adjustment factors. The actual-to-adjusted expected ratio provides an indication of the goodness of fit of the assumption relative to actual experience, where a ratio close to 1.00 is a good fit. The actual-to-adjusted expected ratio is close to 1.00 where the experience is more credible. As can be seen from the Total row (shaded grey), the actual-to-adjusted expected ratio is close to 1.00 for the more credible 515 Series cohort, whereas the 700/780 Series experience is less credible. The goodness-of-fit test by attained age band includes only experience for durations seven and later to reduce the impact of the selection period.

Improvement

For projected mortality improvement, levels of 0.5% and 1.0% are assumed for 15 years beginning in calendar year 2017 for females and males, respectively. The Society of Actuaries (SOA) June 2011 study, *Global Mortality Improvement Experience and Projection Techniques*, provides most-likely mortality improvement assumptions for the period 2011 to 2025 by gender and attained age, for individual annuitants and the general population. For individual annuitants, the average annual improvement rates for males and females are approximately 1.5% and 1.0%, respectively. These rates were about 25 basis points higher than that for the general population. Based on this study, a reasonable range for mortality improvement is 0.0% to 1.5% for males and 0.0% to 1.0% for females for 10 to 20 years.

For projected morbidity improvement, levels of 1.0% and 1.5% are assumed for 15 years beginning in calendar year 2017 for females and males, respectively. This assumption is reasonable based on the SOA July 2016 study, *Long Term Care Morbidity Improvement Study: Estimates for the Non-Insured U.S. Elderly Population Based on the National Long Term Care Survey 1984-2004*. This study reported population annual morbidity improvement of 2.3% for unisex, 2.5% for males, and 2.1% for females. The SOA July 2016 study uses population data, so it is uncertain how well these findings will translate to an insured population. The SOA June 2011 study suggests that an annuitant cohort has more mortality improvement over the general population, so it is possible that this could be true for morbidity as well. Based on these studies, a reasonable range for morbidity improvement is between 0.0% to 2.5% for males and 0.0% to 2.1% for females for 10 to 20 years.

Appendix A
Development and Justification of Current Assumptions

Rate Increase Dependent Assumptions

At the time of a rate increase, insureds have options to elect a contingent benefit upon lapse (CBUL) or reduced benefit options (RBO). Adverse selection is assumed relative to CBUL elections. In determining the justified rate increase amounts, rate increase dependent assumptions were also developed. Very little industry data exists to help determine these assumptions, especially for the magnitude of rate increases that are requested. These insured behavior assumptions are provided below, and are based on MedAmerica and CICA's actual CBUL/RBO election experience to the extent applicable, assumptions for rate increase filings of other carriers in the LTC industry, and actuarial judgment.

While these assumptions generally follow the magnitude of the increase (i.e., higher increase results in higher election of CBUL/RBO), nationwide there has been a prior rate increase on the 515 Series, such that it is expected to have slightly lower election rates in comparison to the magnitude of the rate increase relative to the other series.

Contingent Benefit Upon Lapse Election

Based on each cohort's nationwide average rate increase request for compound inflation protection policies, we assume a CBUL election rate of 10% for the rate increase for 515 Series policies, 10% for 700 Series policies, and 5% for 780 Series policies.

Reduced Benefit Options

It is assumed that premium and benefits will be reduced due to RBO elections by approximately 7.5% for 515 Series policies, 9.7% for 700 Series policies, and 3.4% for 780 Series policies. These assumed reductions were derived from actual RBO election rates based on the combined experience of MedAmerica and its affinity partners following a prior rate increase on this and similar blocks of business along with actuarial judgment. We assume that those electing RBO will reduce their benefits so that premiums after the increase are closer to those before the increase. We assume that the percent reduction in premium corresponds to an equivalent percent reduction in claims. Based on each cohort's nationwide average rate increase request for compound inflation protection policies, we assume 15.0% of 515 Series policies, 17.5% of 700 Series policies, and 12.5% of 780 Series policies will elect RBO. The reduction to premium and claims can then be determined as follows:

Reduction to premium and claims due to the election of RBO
= 1 – (Average premium level after the rate increase with RBO election / Premium level after the full rate increase without any RBO election), where

Average premium level after the rate increase with RBO election
= weighted average premium level of those assumed to elect RBO with those assumed to accept the full rate increase

Adverse Selection

The 3.0% to 5.0% increase to morbidity due to adverse selection was developed from the following formula and actuarial judgment. We assume that at the time of the rate increase, insureds that elect a CBUL will be selective in that their relative morbidity is 25% lower than that of the remaining pool. Similarly, we assume that at the time of the rate increase, insureds that elect an RBO will be selective in that their relative morbidity is 12.5% lower than that of the remaining pool.

PoolMorb = AdvSelMorb x (1 – CBUL – RBO) + [(1 – 25%) x AdvSelMorb] x CBUL + [(1 – 12.5%) x AdvSelMorb] x RBO, where

PoolMorb =	morbidity of the pool before the rate increase = 1.0
AdvSelMorb =	adverse morbidity of the remaining pool after the rate increase due to selective lapses
CBUL =	percentage of policies that elect CBUL
RBO =	percentage of policies that elect RBO

Solving the above for the adverse selection component results in the following formula:

Adverse Selection = 1 / (1 – 25% x CBUL – 12.5% x RBO)
1.045 ~ 1 / (1 – 25% x 10% – 12.5% x 15.0%) for 515 Series
1.050 ~ 1 / (1 – 25% x 10% – 12.5% x 17.5%) for 700 Series
1.030 ~ 1 / (1 – 25% x 5% – 12.5% x 12.5%) for 780 Series

Credibility

The methodology employed to develop the assumptions considers actual historical experience and its associated credibility. The credibility percentage for each assumption was determined as (Number of Events / Credibility Threshold)$^{1/2}$, with events defined as deaths, voluntary lapses, benefit expiries, or claims. A credibility standard of a 90% confidence interval for the number of events with an error of plus or minus 7.5% was chosen. Based on these parameters, 481 events is the criterion for full credibility.

Exhibit A-1a
Actual-to-Expected (A:E) Mortality Experience through December 31, 2015
All Products

Duration	Exposure	Mortality Rate Actual (A)	Mortality Rate 2015GAM (E)	Mortality Rate 2015IAM (X)	Ratios to 2015GAM Actual (A:E)	Ratios to 2015GAM 2015IAM (X:E)	Credibility Percent	A:E Credibility-Weighted with: 2015GAM (E:E=1.00)	A:E Credibility-Weighted with: 2015IAM (X:E)	Smoothed Durational Factors
Issue Age 75+										
1-5	24,998	1.8%	4.4%	3.1%	0.40	0.70	95%	0.43	0.41	0.41
6-10	20,553	5.0%	7.0%	5.5%	0.71	0.78	100%	0.71	0.71	0.71
11-15	11,268	10.1%	10.5%	8.8%	0.96	0.84	100%	0.96	0.96	0.96
16-20	3,330	16.3%	16.1%	14.2%	1.02	0.88	100%	1.02	1.02	1.04
21-25	415	25.3%	22.2%	20.6%	1.14	0.93	47%	1.07	1.03	1.05
26+	25	7.8%	32.1%	30.8%	0.24	0.96	6%	0.95	0.91	1.05
21+	440	24.3%	22.8%	21.2%	1.07	0.93	47%	1.03	0.99	1.05
All	60,589	5.4%	7.2%	5.7%	0.75	0.79	100%	0.75	0.75	0.75
Issue Ages 70 - 74										
1-5	39,706	0.9%	2.2%	1.4%	0.41	0.64	87%	0.49	0.45	0.40
6-10	38,186	2.4%	3.7%	2.5%	0.66	0.67	100%	0.66	0.66	0.65
11-15	27,286	4.9%	6.0%	4.4%	0.83	0.74	100%	0.83	0.83	0.84
16-20	10,157	9.1%	9.4%	7.7%	0.98	0.82	100%	0.98	0.98	0.98
21-25	2,029	14.6%	14.3%	12.3%	1.02	0.86	78%	1.02	0.99	1.04
26+	138	25.8%	20.4%	18.6%	1.27	0.91	27%	1.07	1.01	1.05
21+	2,167	15.3%	14.7%	12.7%	1.04	0.87	83%	1.03	1.01	1.04
All	117,501	3.3%	4.4%	3.2%	0.75	0.73	100%	0.75	0.75	0.75
Issue Ages 65 - 69										
1-5	67,094	0.6%	1.4%	0.9%	0.42	0.65	90%	0.48	0.44	0.40
6-10	65,409	1.4%	2.2%	1.4%	0.64	0.64	100%	0.64	0.64	0.65
11-15	50,103	2.9%	3.7%	2.4%	0.78	0.66	100%	0.78	0.78	0.79
16-20	23,101	5.3%	5.9%	4.3%	0.90	0.74	100%	0.90	0.90	0.90
21-25	6,829	9.5%	9.3%	7.6%	1.03	0.82	100%	1.03	1.03	0.99
26+	533	13.8%	13.6%	11.6%	1.01	0.86	39%	1.01	0.92	1.04
21+	7,362	9.8%	9.6%	7.9%	1.03	0.82	100%	1.03	1.03	0.99
All	213,069	2.2%	3.0%	2.0%	0.75	0.69	100%	0.75	0.75	0.74
Issue Ages 60 - 64										
1-5	93,335	0.3%	0.9%	0.6%	0.41	0.72	82%	0.51	0.46	0.39
6-10	85,284	0.8%	1.4%	0.9%	0.57	0.65	100%	0.57	0.57	0.59
11-15	58,636	1.5%	2.3%	1.5%	0.68	0.65	100%	0.68	0.68	0.67
16-20	27,386	3.2%	3.8%	2.5%	0.85	0.67	100%	0.85	0.85	0.83
21-25	9,435	5.5%	6.1%	4.5%	0.90	0.75	100%	0.90	0.90	0.90
26+	782	9.5%	9.1%	7.5%	1.05	0.82	39%	1.02	0.91	0.97
21+	10,217	5.8%	6.3%	4.8%	0.92	0.76	100%	0.92	0.92	0.91
All	274,857	1.2%	1.8%	1.2%	0.68	0.68	100%	0.68	0.68	0.67

Exhibit A-1b
Actual-to-Expected (A:E) Mortality Experience through December 31, 2015
Individual Products

Duration	Exposure	Mortality Rate Actual (A)	Mortality Rate 2015GAM (E)	Mortality Rate 2015IAM (X)	Ratios to 2015GAM Actual (A:E)	Ratios to 2015GAM 2015IAM (X:E)	Credibility Percent	A:E Credibility-Weighted with: 2015GAM (E:E=1.00)	A:E Credibility-Weighted with: 2015IAM (X:E)	Smoothed Durational Factors
Issue Age <60										
1-5	213,822	0.1%	0.3%	0.2%	0.39	0.86	66%	0.59	0.55	0.38
6-10	134,800	0.3%	0.5%	0.4%	0.54	0.77	88%	0.59	0.56	0.54
11-15	57,646	0.6%	0.9%	0.7%	0.61	0.69	83%	0.67	0.62	0.60
16-20	24,577	1.1%	1.5%	1.0%	0.70	0.67	74%	0.78	0.69	0.70
21-25	9,193	1.7%	2.4%	1.6%	0.70	0.67	57%	0.83	0.68	0.79
26+	759	2.9%	4.4%	3.1%	0.65	0.72	21%	0.93	0.70	0.87
21+	9,952	1.8%	2.6%	1.7%	0.69	0.68	61%	0.81	0.68	0.80
All	440,797	0.3%	0.6%	0.4%	0.56	0.75	100%	0.56	0.56	0.57

Exhibit A-2a
Derived Lifetime-Pay Voluntary Lapse Experience from Acquisition through December 31, 2015
CICA 515 Series Policy Forms

Duration	Exposure	Composite Termination Rates	Expected Mortality Rates	Derived Lapse Rates	Credibility Percent	Smoothed Lapse Rates
7	1,626	6.8%	0.8%	6.0%	43%	6.00%
8	2,829	5.2%	1.1%	4.1%	48%	4.00%
9	3,893	4.6%	1.3%	3.2%	49%	3.00%
10	4,537	4.8%	1.6%	3.3%	52%	3.00%
11	4,981	4.1%	1.8%	2.3%	44%	2.00%
12	4,896	5.0%	2.1%	2.9%	45%	2.00%
13	4,376	3.9%	2.4%	1.5%	38%	2.00%
14	3,482	4.3%	2.7%	1.6%	29%	2.00%
15	2,300	3.6%	3.0%	0.6%	26%	2.00%
16	1,434	4.2%	3.5%	0.7%	14%	2.00%
17	598	7.4%	3.9%	3.6%	18%	2.00%
18	96	2.1%	3.9%	-1.9%	0%	2.00%
7-9	8,347	5.2%	1.1%	4.1%	81%	3.9%
7+	35,047	4.6%	2.0%	2.6%	100%	2.6%
8+	33,421	4.5%	2.1%	2.4%	100%	2.4%
9+	30,592	4.4%	2.2%	2.3%	100%	2.3%
10+	26,699	4.4%	2.3%	2.1%	100%	2.2%

Exhibit A-2b
Derived Lifetime-Pay Voluntary Lapse Experience from Acquisition through December 31, 2015
CICA 700 and 780 Series Policy Forms

Duration	Exposure	Composite Termination Rates	Expected Mortality Rates	Derived Lapse Rates	Credibility Percent	Smoothed Lapse Rates
7	2,190	4.3%	0.8%	3.5%	40%	3.50%
8	2,125	4.1%	1.0%	3.2%	36%	3.00%
9	1,842	3.4%	1.1%	2.3%	24%	2.50%
10	1,282	3.4%	1.3%	2.2%	23%	1.50%
11	717	2.5%	1.4%	1.1%	15%	1.50%
12	353	3.7%	1.6%	2.1%	10%	1.50%
13	139	2.2%	1.9%	0.3%	6%	1.50%
14	40	0.0%	2.2%	-2.2%	0%	1.50%
15	4	0.0%	2.6%	-2.6%	0%	1.50%
16	1	0.0%	3.5%	-3.6%	0%	1.50%
7-9	6,158	4.0%	0.9%	3.0%	59%	3.0%
7+	8,694	3.7%	1.1%	2.6%	66%	2.6%
8+	6,504	3.5%	1.2%	2.4%	53%	2.3%
9+	4,378	3.2%	1.3%	1.9%	38%	1.9%
10+	2,536	3.1%	1.4%	1.7%	30%	1.5%

Exhibit A-3
Actual-to-Expected (A:E) Benefit Expiration Experience through December 31, 2015
Subset of MedAmerica Organic Business

Attained Age Band	Exposure	Actual Expiry Rate	Expected Expiry Rate	Expiry A:E	Credibility Percent	Credibility-Weighted A:E	Smoothed Adjustment Factors
<80	528,089	0.03%	0.04%	0.70	56%	0.83	0.85
80-84	50,683	0.52%	0.41%	1.27	74%	1.20	1.25
85-89	22,568	1.52%	1.04%	1.46	85%	1.39	1.45
90+	6,638	4.43%	2.47%	1.79	78%	1.62	1.65
All	607,979	0.17%	0.14%	1.28	100%	1.28	1.28

Exhibit A-4a
MedAmerica, CICA, and CLICNY
Actual-to-Expected Morbidity Adjustment Factors
All CICA Series

Duration	515 Series Adjustment Factor	700 Series Adjustment Factor	780 Series Adjustment Factor
1	0.84	0.79	0.82
2	0.86	0.81	0.84
3	0.88	0.82	0.86
4	0.91	0.84	0.88
5	0.93	0.85	0.89
6	0.95	0.87	0.91
7	0.97	0.88	0.93
8	1.00	0.90	0.95
9	0.96	0.89	0.93
10	0.92	0.87	0.91
11	0.89	0.86	0.88
12	0.85	0.85	0.86
13	0.82	0.84	0.84
14	0.84	0.86	0.86
15	0.85	0.88	0.88
16	0.87	0.90	0.90
17	0.88	0.92	0.92
18	0.90	0.94	0.94
19	0.89	0.93	0.93
20	0.88	0.91	0.91
21	0.87	0.89	0.89
22	0.86	0.88	0.88
23	0.85	0.86	0.86
24	0.86	0.87	0.87
25	0.87	0.88	0.88
26	0.88	0.89	0.89
27	0.89	0.90	0.90
28	0.90	0.90	0.90
29	0.90	0.90	0.90
30+	0.90	0.90	0.90

Attained Age	515 Series Adjustment Factor	700 Series Adjustment Factor	780 Series Adjustment Factor
<65	0.87	0.86	0.86
65-69	1.02	1.00	1.03
70-74	1.11	1.05	1.11
75-79	1.17	1.09	1.15
80-84	1.17	1.08	1.13
85-89	1.17	1.21	1.21
90+	1.17	1.22	1.22

Coverage Type	Adjustment Factor
Comprehensive	0.90
Nursing Home Only	1.09
Home Care Only	1.23

Exhibit A-4b
MedAmerica, CICA, and CLICNY
Actual-to-Adjusted Expected Incurred Claims
All CICA Series

Experience By Policy Duration All Durations				
	515 Series		700 and 780 Series	
Duration	Credibility	Actual to Adjusted Expected	Credibility	Actual to Adjusted Expected
1	0%	1.00	0%	0.00
2	0%	1.00	0%	0.00
3	0%	1.00	5%	2.89
4	8%	6.02	0%	0.00
5	6%	0.84	5%	0.00
6	10%	1.26	14%	1.18
7	14%	1.36	14%	0.65
8	21%	1.36	16%	2.50
9	23%	0.62	10%	0.93
10	32%	1.19	10%	0.94
11	34%	0.79	8%	0.81
12	40%	1.27	0%	0.45
13	34%	1.20	0%	0.46
14	31%	0.61	0%	1.36
15	20%	0.86	5%	58.72
16	16%	1.18	0%	0.10
17	5%	0.72	0%	1.00
18	0%	38.01	0%	1.00
19	0%	1.00	0%	1.00
20	0%	1.00	0%	1.00
21	0%	1.00	0%	1.00
22	0%	1.00	0%	1.00
23	0%	1.00	0%	1.00
24	0%	1.00	0%	1.00
25	0%	1.00	0%	1.00
1-5	10%	2.44	6%	0.30
6-10	48%	1.06	29%	1.30
11-15	72%	0.98	9%	0.92
16+	16%	1.11	0%	0.10
21-25	0%	1.00	0%	1.00
Total	89%	1.02	31%	1.11

Experience By Attained Age Durations 7 and Later				
	515 Series		700 and 780 Series	
Attained Age	Credibility	Actual to Adjusted Expected	Credibility	Actual to Adjusted Expected
<65	10%	0.51	5%	0.24
65-69	14%	1.05	8%	0.50
70-74	32%	1.08	17%	1.95
75-79	45%	1.04	15%	1.56
80-84	51%	1.04	10%	0.44
85-89	37%	0.84	5%	1.42
90+	19%	0.84	-	1.00
<70	17%	0.89	9%	0.42
<75	36%	1.02	19%	1.30
<80	58%	1.03	25%	1.39
<85	77%	1.03	27%	1.26
65-79	57%	1.05	24%	1.50
70-84	75%	1.05	25%	1.53
75-89	78%	1.00	19%	1.22
70+	86%	1.01	25%	1.52
75+	80%	1.00	19%	1.22
80+	66%	0.97	11%	0.64
85+	42%	0.84	5%	1.42

Reset Form

Health Insurance Rate Request Summary
Part 1 – To Be Completed By Company

Company Name and NAIC Number: MedAmerica Insurance Company - NAIC # 69515

SERFF Tracking Number: MILL-131333141

Effective Date: This rate increase will apply to policies on their next premium payment date following at least a 75-day policyholder notification period following approval.

(Projected) Number of Insureds Affected: 147

New Rates

Average Annual Premium Per Member: N/A

Revised Rates

Average Annual Premium Per Member: 1,077

Average Requested Percentage Rate Change Per Member: 68%

Minimum Requested Percentage Rate Change Per Member: 0%

Maximum Requested Percentage Rate Change Per Member: 130%

Plans Affected
(The Form Number and "Product Name")

Form#	"Product Name"(if applicable)
14515-VA	Tax-Qualified Long-Term Care Policy Form
14531	Home Health Care Rider
14532	Inflation Protection Rider
14533	Non-Forfeiture Rider

Attach a brief narrative to summarize the key information used to develop the rates including the main drivers for new or revised rates.

This document is intended to help explain the rate filing and it is only a summary of the company's request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.

Health Insurance Rate Request Summary
Summary of Key Information

Rates are increasing based on the fact that people are living longer and keeping their policies for a longer time than expected. This means we, as the company, expect to pay more claims in the future. New data on the company and industry-wide claim costs show that those costs are higher than originally expected when the product was priced.

8500 Normandale Lake Blvd.
Suite 1850
Minneapolis, MN 55437-3830
USA

Tel +1 952 897 5300
Fax +1 952 897 5301

milliman.com

January 29, 2019

Honorable Scott A. White
Commissioner of Insurance
Virginia Bureau of Insurance (Bureau)

Tyler Building, 1300 E. Main St.
Richmond, Virginia 23219

Via SERFF

Re: MedAmerica Insurance Company (MedAmerica)
Company NAIC # 69515
SERFF Tracking # MILL-131333141
515 Series

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Commissioner White:

On behalf of MedAmerica, we are submitting the referenced rate filing for your review. This is an existing individual policy form that provides long-term care coverage on a reimbursement basis. This policy form was written by Combined Insurance Company of America (CICA) and issued in Virginia between February 25, 1999 and October 4, 2006. The form is no longer being marketed in any jurisdiction.

In 2008, MedAmerica acquired the long-term care block of business issued by CICA from Ace Ltd. and subsequently submitted a certificate of assumption filing. As a result, most of the nationwide policies are now on MedAmerica paper; however, approximately 16% of the policyholders nationwide objected to the assumption filing and remain on CICA paper. In Virginia, approximately 13% of the in-force policies are on CICA paper. MedAmerica has 100% of the risk on these series, including policies on CICA paper, and administers and manages the entire block.

CICA is making a similar request on this form in a concurrent filing (SERFF Tracking # MILL-131588701).

The company is requesting the approval of a premium rate increase on the above-listed form, including all associated riders. This form is in need of a premium rate increase due to emerging and projected experience running more adverse than previously expected. The company is requesting a premium rate increase on policies with compound inflation protection, as shown in the following table. No rate increase is being requested on policies without inflation protection. The rate increase level was determined to vary by inflation option to better align the rate increase with the adverse experience.

Offices in Principal Cities Worldwide

This work product was prepared to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends Recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

Virginia-Specific Rate Increase Request for Policies with Inflation Protection

Series	Current Requested Increase
515	130%

There have been no previous rate revisions on the above-referenced form. The company is seeking this current rate increase request to help alleviate the poor performance on this block of business. The rate level requested in this jurisdiction is the same as that requested nationwide, except where limited by regulatory restrictions.

The company will offer insureds affected by the premium increase the option of reducing their policy benefits to provide flexibility of choice for those insureds who wish to maintain a premium level reasonably similar to what they were paying prior to the rate increase. The company will offer a contingent benefit upon lapse to insureds that trigger a substantial rate increase. Additionally, the company will voluntarily offer a contingent benefit upon lapse to insureds affected by the rate increase, even if the increase is not considered substantial.

Enclosed with this submission is a policyholder notification letter, provided by the company, which is in compliance with 14VAC5-200-75. Additionally, a contingent nonforfeiture (CNF) benefit election form that is provided to policyholders alongside the notification letter is also being filed with the Bureau. Enclosed with this submission are the appropriate statement of variability, certification of compliance, and readability certification for these forms, as required.

The following electronic items are included with this submission:

- cover letter
- Rate Review Requirements Checklist
- Health Insurance Rate Request Summary
- letter from MedAmerica authorizing us to submit this filing on their behalf
- actuarial memorandum
- supplement to the actuarial memorandum
- current and proposed premium rate schedules
- policyholder notification letter
- CNF election form
- statement of variability
- certificate of compliance
- readability certification

No filing fee is required for this submission.

This work product was prepared to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends Recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

The contact person for this filing is:

Michael Emmert, ASA, MAAA
Associate Actuary
Milliman, Inc.
8500 Normandale Lake Blvd., Suite 1850
Minneapolis, MN 55437
(952) 820-3116
michael.emmert@milliman.com

Thank you for your assistance in reviewing this filing.

Respectfully,

Missy Gordon

Missy Gordon, FSA, MAAA
Principal and Consulting Actuary

MAG/cmn

Enclosures

This work product was prepared to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends Recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

MEDAmerica
INSURANCE COMPANY
An Excellus Company

Letter of Authorization

To: Department of Insurance

MedAmerica Insurance Company ("MedAmerica") has entered into a service agreement with Milliman, Inc. ("Milliman") effective October 3, 2016, that includes long-term care rate filing services on our behalf. The agreement provides, in part, that Milliman is responsible for preparing and filing for approval with state insurance departments MedAmerica's long-term care rate increase filings as directed by MedAmerica. Milliman is also authorized to receive, on MedAmerica's behalf, written and oral communication from each state department of insurance for the purpose of completing the rate increase filing process.

Please accept this letter of authorization for the purpose stated above. Should you have any questions regarding the above, please forward your comments to:

MedAmerica Insurance Company
165 Court Street
Rochester, NY 14647

Bill Naylon

Bill Naylon, President
MedAmerica Insurance Company

1/11/18
Date

Statement of Variability – Combined Insurance Company of America (CICA) Assumed Product Line

RIL-VA-0918 and CNF-VA-0918 –Rate Increase Letter and Contingent Non-Forfeiture Election Form for Premier Insureds

<<LOGO>>
Populates with the MedAmerica Insurance Company logo

<<DATE>>
Populates with the date the documents were sent, in Month, Day (XX), Year (2019/2020/2021) format

<<FIRST_NAME>> <<LAST_NAME>>
<<STREET_ADDRESS1>>
<<STREET_ADDRESS2>>
<<CITY>> <<STATE>> <<ZIP>>
<<POLICY_NUMBER>>
<<SALUTATION LAST_NAME>>
Populated with demographic information of the insured receiving the rate increase notice.

<<PHASE_IN>>
If the insured has a one year phase in, this field populates with: we have filed a premium increase of <<INC_AMT>>

If the insured has a multiple year phase in, this field populates with: <<PHASE_NUMBER>> consecutive annual premium increases have been filed

<<INC_AMT>>
The rate increase percentage amount, 63% - 264%, or other amount approved by the Virginia Bureau of Insurance

<<PHASE_NUMBER>>
The number of years that the insured's rate increase is phased over

<<REASON_FOR_RATE_INCREASE>>
Populates with: Rates are increasing based on the fact that people are living longer and keeping their policies for a longer period of time than expected. This means we, as the company, expect to pay more claims in the future. New data on the company and industry-wide claim costs show that those costs are higher than originally expected when the product was priced.

<<CHANGE>>
If the insured has a one year phase in, this field populates with the word: change

If the insured has a multiple year phase in, this field populates with the word: changes

<<NEXT_BILL_DATE>>
Next bill date of policy in Month, Day (XX), Year (2019/2020/2021) format

<<MODAL>>
Monthly, Quarterly, Semi-Annual, Annual

<<CURRENT_RATE>>
Populates with dollar amount for current premium in $9,999.99 format

<<FUTURE_RATE>>
Populates with dollar amount for future rate increased premium in $9,999.99 format

<<INC_AMT_2>>
If the insured has a phased in rate increase, this field will populate with the second year rate increase percentage amount approved by the Virginia Bureau of Insurance

<<YEAR_2>>
If the insured has a phased in rate increase, this field will populate with the year that the second rate increase will be effective

<<INC_AMT_3>>
If the insured has a phased in rate increase, this field will populate with the third year rate increase percentage amount approved by the Virginia Bureau of Insurance

<<YEAR_3>>
If the insured has a phased in rate increase, this field will populate with the year that the third rate increase will be effective

<<CS_PHONE>>
Populates with the Company's Customer Service phone number, 1-800-240-1675

<<RESULT_OF_CNF_FORMULA>>
Populates with Contingent Non-Forfeiture Benefit amount $9,999.99 format

<<INPUT_1>>
Populates with: Daily Benefit Amount

<<INPUT_2>>
Populates with: Lifetime Benefit Amount

<<RIDERS_STATEMENT>>
Populates with: All riders and inflation options will be terminated.

<<IMPORTANT_NOTE>>
*Populates with: **IMPORTANT NOTE:** If your policy includes a Spousal Benefit Transfer Rider, both you and*

your spouse must continue to maintain identical coverage. You must both select the same option regarding this rate increase.

<<OFFICE_ADDRESS>>
Populates with 165 Court St. Rochester, NY 14647

<<OFFICER_SIGNATURE>>
Populates with Cheryl Bush's signature

<<OFFICER_NAME>>
Populates with Cheryl Bush, RN

<<OFFICER_TITLE>>
Populates with Senior Vice President, Operations

<<Enclosure>>
Populates with Enclosure. Options that may be included as an enclosure: Business Reply Envelope, Contingent Non-Forfeiture Benefit Election Form

MEDAMERICA INSURANCE COMPANY

RATE SHEET FOR POLICY FORM 14515 WITH COMPOUND INFLATION

CURRENT ANNUAL PREMIUMS (Per $10 of Benefit) FOR POLICIES ISSUED PRIOR TO OCTOBER 1, 2003

	Lifetime Multiplier = 400			**Lifetime Multiplier = 800**			**Lifetime Multiplier = 1200**			**Lifetime Multiplier = 1600**			**Lifetime Multiplier = Unlimited**		
Issue	*Elimination Period*			*Elimination Period*			*Elimination Period*			*Elimination Period*			*Elimination Period*		
Age	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*
18-44	$25	$23	$21	$33	$29	$27	$37	$33	$31	$40	$35	$33	$54	$48	$44
45-49	$34	$30	$28	$46	$40	$38	$52	$46	$42	$58	$50	$46	$84	$72	$66
50	$37	$33	$31	$50	$45	$41	$60	$52	$49	$68	$58	$54	$97	$83	$78
51	$38	$35	$31	$52	$46	$42	$63	$56	$50	$71	$61	$56	$102	$88	$81
52	$40	$34	$32	$55	$48	$44	$67	$57	$51	$74	$65	$59	$106	$93	$84
53	$42	$36	$34	$59	$49	$45	$70	$60	$55	$79	$68	$62	$112	$98	$89
54	$43	$38	$34	$60	$53	$47	$73	$64	$58	$83	$71	$66	$118	$102	$94
55	$45	$39	$36	$64	$56	$50	$79	$67	$60	$88	$75	$69	$123	$108	$97
56	$47	$41	$37	$69	$58	$52	$84	$71	$65	$93	$80	$73	$132	$113	$104
57	$48	$43	$39	$74	$63	$56	$89	$76	$68	$100	$85	$78	$141	$122	$111
58	$53	$46	$40	$79	$68	$61	$96	$83	$75	$109	$92	$85	$151	$131	$120
59	$57	$48	$44	$86	$73	$66	$104	$90	$81	$117	$101	$92	$163	$141	$128
60	$62	$53	$47	$93	$80	$71	$113	$96	$87	$127	$109	$98	$177	$153	$138
61	$65	$56	$51	$100	$85	$78	$121	$105	$94	$138	$118	$107	$190	$165	$150
62	$70	$59	$54	$108	$92	$83	$131	$113	$101	$146	$126	$115	$203	$176	$160
63	$75	$64	$57	$114	$96	$87	$137	$119	$107	$155	$134	$121	$214	$185	$167
64	$79	$67	$62	$118	$100	$90	$143	$123	$111	$160	$139	$125	$222	$192	$174
65	$84	$71	$64	$122	$104	$94	$150	$129	$117	$167	$144	$131	$230	$200	$181
66	$88	$76	$69	$129	$112	$100	$158	$136	$122	$177	$153	$139	$243	$210	$191
67	$95	$83	$75	$139	$119	$107	$170	$146	$133	$192	$165	$150	$262	$226	$206
68	$104	$89	$82	$153	$131	$118	$186	$161	$144	$210	$181	$163	$286	$247	$223
69	$113	$98	$88	$168	$144	$129	$206	$178	$159	$231	$199	$179	$312	$271	$246
70	$123	$107	$97	$185	$159	$143	$226	$195	$175	$254	$220	$198	$344	$297	$269
71	$134	$117	$105	$204	$175	$157	$249	$215	$194	$280	$241	$219	$379	$327	$296
72	$149	$128	$115	$226	$194	$174	$277	$238	$214	$310	$267	$242	$418	$362	$326
73	$164	$142	$128	$250	$213	$191	$305	$264	$237	$343	$295	$267	$460	$398	$360
74	$181	$156	$142	$275	$236	$211	$335	$290	$261	$378	$326	$295	$507	$438	$396
75	$200	$172	$156	$300	$257	$231	$370	$319	$286	$416	$357	$323	$556	$480	$434
76	$220	$190	$172	$330	$283	$254	$404	$350	$315	$454	$392	$354	$608	$526	$476
77	$242	$209	$189	$360	$309	$279	$443	$383	$344	$498	$429	$389	$665	$575	$519
78	$265	$228	$206	$395	$339	$306	$484	$419	$376	$545	$471	$425	$725	$628	$567
79	$291	$250	$226	$432	$372	$336	$530	$457	$410	$597	$515	$466	$794	$686	$619
80	$317	$272	$246	$469	$406	$367	$576	$497	$446	$649	$560	$505	$863	$746	$672
81	$342	$294	$266	$507	$439	$398	$621	$537	$481	$700	$604	$545	$927	$801	$723
82	$365	$314	$283	$542	$469	$424	$662	$571	$512	$745	$643	$580	$983	$848	$766
83	$391	$335	$302	$578	$502	$453	$705	$607	$546	$791	$682	$616	$1,040	$898	$808
84	$415	$356	$320	$615	$533	$480	$745	$644	$580	$835	$720	$650	$1,093	$943	$849
85+	$555	$471	$418	$811	$694	$617	$962	$826	$738	$1,061	$911	$817	$1,322	$1,129	$1,009

MEDAMERICA INSURANCE COMPANY

RATE SHEET FOR POLICY FORM 14515 WITH COMPOUND INFLATION

CURRENT ANNUAL PREMIUMS (Per $10 of Benefit) FOR POLICIES ISSUED ON OR AFTER OCTOBER 1, 2003

	Lifetime Multiplier = 400			**Lifetime Multiplier = 800**			**Lifetime Multiplier = 1200**			**Lifetime Multiplier = 1600**			**Lifetime Multiplier = Unlimited**		
Issue	*Elimination Period*			*Elimination Period*			*Elimination Period*			*Elimination Period*			*Elimination Period*		
Age	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*	*20 Days*	*90 Days*	*180 Days*
18-44	$25	$23	$21	$33	$29	$27	$37	$33	$31	$40	$35	$33	$54	$48	$44
45-49	$34	$30	$28	$46	$40	$38	$52	$46	$42	$58	$50	$46	$84	$72	$66
50	$37	$33	$31	$50	$45	$41	$60	$52	$49	$68	$58	$54	$97	$83	$78
51	$38	$35	$31	$52	$46	$42	$63	$56	$50	$71	$61	$56	$102	$88	$81
52	$40	$34	$32	$55	$48	$44	$67	$57	$51	$74	$65	$59	$106	$93	$84
53	$42	$36	$34	$59	$49	$45	$70	$60	$55	$79	$68	$62	$112	$98	$89
54	$43	$38	$34	$60	$53	$47	$73	$64	$58	$83	$71	$66	$118	$102	$94
55	$45	$39	$36	$64	$56	$50	$79	$67	$60	$88	$75	$69	$123	$108	$97
56	$47	$41	$37	$69	$58	$52	$84	$71	$65	$93	$80	$73	$132	$113	$104
57	$48	$43	$39	$74	$63	$56	$89	$76	$68	$100	$85	$78	$141	$122	$111
58	$53	$46	$40	$79	$68	$61	$96	$83	$75	$109	$92	$85	$151	$131	$120
59	$57	$48	$44	$86	$73	$66	$104	$90	$81	$117	$101	$92	$163	$141	$128
60	$62	$53	$47	$93	$80	$71	$113	$96	$87	$127	$109	$98	$177	$153	$138
61	$65	$56	$51	$100	$85	$78	$121	$105	$94	$138	$118	$107	$190	$165	$150
62	$70	$59	$54	$108	$92	$83	$131	$113	$101	$146	$126	$115	$203	$176	$160
63	$75	$64	$57	$114	$96	$87	$137	$119	$107	$155	$134	$121	$214	$185	$167
64	$79	$67	$62	$118	$100	$90	$143	$123	$111	$160	$139	$125	$222	$192	$174
65	$84	$71	$64	$122	$104	$94	$150	$129	$117	$167	$144	$131	$230	$200	$181
66	$88	$76	$69	$129	$112	$100	$158	$136	$122	$177	$153	$139	$243	$210	$191
67	$95	$83	$75	$139	$119	$107	$170	$146	$133	$192	$165	$150	$262	$226	$206
68	$104	$89	$82	$153	$131	$118	$186	$161	$144	$210	$181	$163	$286	$247	$223
69	$113	$98	$88	$168	$144	$129	$206	$178	$159	$231	$199	$179	$312	$271	$246
70	$123	$107	$97	$185	$159	$143	$226	$195	$175	$254	$220	$198	$344	$297	$269
71	$134	$117	$105	$204	$175	$157	$249	$215	$194	$280	$241	$219	$379	$327	$296
72	$149	$128	$115	$226	$194	$174	$277	$238	$214	$310	$267	$242	$418	$362	$326
73	$164	$142	$128	$250	$213	$191	$305	$264	$237	$343	$295	$267	$460	$398	$360
74	$181	$156	$142	$275	$236	$211	$335	$290	$261	$378	$326	$295	$507	$438	$396
75	$200	$172	$156	$300	$257	$231	$370	$319	$286	$416	$357	$323	$556	$480	$434
76	$220	$190	$172	$330	$283	$254	$404	$350	$315	$454	$392	$354	$608	$526	$476
77	$242	$209	$189	$360	$309	$279	$443	$383	$344	$498	$429	$389	$665	$575	$519
78	$265	$228	$206	$395	$339	$306	$484	$419	$376	$545	$471	$425	$725	$628	$567
79	$291	$250	$226	$432	$372	$336	$530	$457	$410	$597	$515	$466	$794	$686	$619
80	$317	$272	$246	$469	$406	$367	$576	$497	$446	$649	$560	$505	$863	$746	$672
81	$342	$294	$266	$507	$439	$398	$621	$537	$481	$700	$604	$545	$927	$801	$723
82	$365	$314	$283	$542	$469	$424	$662	$571	$512	$745	$643	$580	$983	$848	$766
83	$391	$335	$302	$578	$502	$453	$705	$607	$546	$791	$682	$616	$1,040	$898	$808
84	$415	$356	$320	$615	$533	$480	$745	$644	$580	$835	$720	$650	$1,093	$943	$849
85+	$555	$471	$418	$811	$694	$617	$962	$826	$738	$1,061	$911	$817	$1,322	$1,129	$1,009

8500 Normandale Lake Blvd.
Suite 1850
Minneapolis, MN 55437-3830
USA

Tel +1 952 897 5300
Fax +1 952 897 5301

milliman.com

August 30, 2018

Bill Dismore
Virginia Bureau of Insurance (Bureau)

Tyler Building, 1300 E. Main St.
Richmond, Virginia 23219

Via SERFF

Re: MedAmerica Insurance Company (MedAmerica)
Company NAIC # 69515
SERFF Tracking # MILL-131333141
515 Series

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Mr. Dismore:

Thank you for reviewing this filing. This letter is in response to your letter dated July 20, 2018 regarding information needed for the above-referenced filing. The remainder of this letter provides the additional information requested in your July 20 letter. The requests are restated in italics for reference.

Per our telephone conversation of [July 20, 2018], because the forms are filed on both MedAmerica and Combined Insurance paper there are two options available. (1) File the Rate Revision as two separate filings or (2) File as one filing but clearly separate the MedAmerica and Combined rate information specific to each Company.

Although a separate filing is required for each company, the experience of the policy form(s) can be combined. Experience and projection exhibits should be provided in total and separately for those with and without inflation option(s). They should be limited to the policy and rider forms applicable in Virginia. Do not include other forms for which there are not any Virginia policyholders.

Two separate filings are being submitted. Both filings use the same experience based on the combined policy forms of both companies. Enclosed are filing materials for the MedAmerica policy forms. The request on the Combined Insurance Company of America (CICA) policy forms is being submitted in a separate filing (SERFF Tracking # MILL-131588701). The enclosed actuarial memorandum and supplement reflect pooled experience of the policy forms listed above as well as similar nationwide policy forms of the 515, 700, and 780 Series for policies with inflation protection options for both companies combined. The nationwide experience provided in the actuarial memorandum reflects nationwide actual rate levels, whereas the supplement restates nationwide experience to reflect the Virginia rate level (i.e., no prior increases).

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From your discussion with Michael Emmert (Milliman) on August 21, we understand that in addition to the experience and projection exhibits this request is also for the exhibits demonstrating of compliance with minimum loss ratio tests. This includes both nationwide and Virginia-specific experience, along with splits by issue date.

The following attachments to this letter provide similar information as the supplement to the actuarial memorandum, except for the subset of experience and splits as requested. That is, these attachments reflect nationwide experience and projections that is limited to the policy and rider forms applicable in Virginia (i.e., 515 Series only) and does not include other forms. Each attachment provides the experience (1) in total, (2) for policies without inflation protection options, and (3) for policies with inflation protection options.

- Attachment A provides the experience and projection exhibit similar to Attachment 2 of the enclosed supplement to the actuarial memorandum. Attachment A-3 includes policies with inflation protection options, consistent with Attachment 2, except is limited to 515 Series only.
- Attachment B provides the dual loss ratio test similar to Attachment 1 of the enclosed supplement to the actuarial memorandum. The original pricing loss ratios were calculated using the actual mix of policies sold, a 50-year projection, original pricing assumptions, and the maximum valuation interest rate at the time of pricing of 4.5%. Attachment B-3 includes policies with inflation protection options, consistent with Attachment 1, except is limited to 515 Series only.
- Attachment C provides similar information to Attachment B, except for policies issued prior to October 1, 2003. Attachment C-3 includes policies with inflation protection options, consistent with Attachment 4 of the supplement to the actuarial memorandum, except is limited to 515 Series only.
- Attachment D provides the 58%/85% test similar to Attachment 6 of the enclosed supplement to the actuarial memorandum, except for all policies regardless of issue date.
- Attachment E provides similar information to Attachment D, except for policies issued on or after October 1, 2003. Attachment E-3 includes policies with inflation protection options, consistent with Attachment 6, except is limited to 515 Series only.

Attachments F through J to this letter provide the same information as Attachments A through E, respectively, except provide Virginia-specific experience. The following attachments include policies with inflation protection options, which is consistent with the following attachments to the supplement to the actuarial memorandum:

- Attachment F-3 matches the experience and projection exhibit in Attachment 3.
- Attachment G-3 provides the dual loss ratio test similar to Attachment 5, except includes all issue dates.
- Attachment H-3 matches Attachment 5.
- Attachment I-3 provides the 58%/85% test similar to Attachment 7, except includes all issue dates.
- Attachment J-3 matches Attachment 7.

We note the following regarding these attachments to this letter:

- No rate increase is being requested on policies without inflation protection as shown in Attachments “-2”.
- We believe that it is appropriate to evaluate the rate increase using the subset of policies subject to the rate increase request and in total. Exhibit II of the actuarial memorandum (58%/85% test) and Attachment 1 of the supplement (dual loss ratio test) provide demonstrations of compliance with loss ratio requirements for the subset of the business to which the rate increase applies (i.e., for policies with inflation options only). As we believe the loss ratio requirement is applicable in total (i.e., all inflation options combined), prior to submission we performed additional analyses to confirm that the loss ratio requirement was satisfied in total. We confirmed that this is still true when nationwide experience is limited to the policy and rider forms applicable in Virginia (i.e., 515 Series only) and does not include other forms, as shown in Attachments B-1 and D-1.
- Attachments C and E provide bifurcated experience by issue year based on the rate stability date in Virginia as commonly requested. These attachments are provided as commonly requested even though we believe

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it is appropriate to combine the experience as shown in Attachments B-1 and D-1 because the original pricing premium rates are the same for all policies regardless of issue year.

- Attachments F through J provide Virginia-specific experience, which is not fully credible, but provided as commonly requested.

Limitations and Qualifications

Milliman's work has been prepared for the use and benefit of MedAmerica. Milliman's work may not be provided to third parties without Milliman's prior written consent. Milliman does not intend to benefit any third party recipient of its work product, even if Milliman consents to the release of its work product to such third party.

Milliman's work is being delivered to the Bureau, in accordance with its statutory and regulatory requirements. Milliman recognizes that materials it delivers to the Bureau may be public records subject to disclosure to third parties, however, Milliman does not intend to benefit and assumes no duty or liability to any third parties, including the Bureau, who receive Milliman's work and may include disclaimer language on its work product so stating. To the extent that Milliman's work is not subject to disclosure under applicable public records laws, the Bureau agrees that it shall not disclose Milliman's work product to third parties without Milliman's prior written consent; provided, however, that the Bureau may distribute Milliman's work to (i) its professional service providers who are subject to a duty of confidentiality and who agree to not use Milliman's work product for any purpose other than to provide services to the Bureau, or (ii) any applicable regulatory or governmental agency, as required.

In performing this analysis, we relied on data and other information provided by MedAmerica. We have not audited or verified this data and other information. If the underlying data or information is inaccurate or incomplete, the results of our analysis may likewise be inaccurate or incomplete. In that event, the results of our analysis may not be suitable for the intended purpose. We performed a limited review of the data used directly in our analysis for reasonableness and consistency and have not found material defects in the data. If there are material defects in the data, it is possible that they would be uncovered by a detailed, systematic review and comparison of the data to search for data values that are questionable or for relationships that are materially inconsistent. Such a review was beyond the scope of our assignment.

Differences between our projections and actual amounts depend on the extent to which future experience conforms to the assumptions made for this analysis. It is certain that actual experience will not conform exactly to the assumptions used in this analysis. Actual amounts will differ from projected amounts to the extent that actual experience deviates from expected experience.

I, Missy Gordon, am a Principal and Consulting Actuary for Milliman, Inc. I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render an actuarial opinion as described herein.

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❖❖❖

Bill, thank you for working with us to complete this filing in Virginia. Please let me know if you have any additional questions. You can reach me directly at (952) 820-2478 or by e-mail at missy.gordon@milliman.com. Alternatively, you may contact Michael Emmert, the contact of record for this filing, at (952) 820-3116 or by e-mail at michael.emmert@milliman.com.

Respectfully,

Missy Gordon, FSA, MAAA
Principal and Consulting Actuary

MAG/ddm

Attachment A:	Restated Nationwide Historical and Projected Experience by Calendar Year for the 515 Series
Attachment B:	Restated Nationwide Dual Loss Ratio Test for the 515 Series
Attachment C:	Restated Nationwide Dual Loss Ratio Test for Policies Issued Prior to October 1, 2003 for the 515 Series
Attachment D:	Restated Nationwide 58%/85% Test for the 515 Series
Attachment E:	Restated Nationwide 58%/85% Test for Policies Issued On or After October 1, 2003 for the 515 Series
Attachment F:	Virginia-Specific Historical and Projected Experience by Calendar Year
Attachment G:	Virginia-Specific Dual Loss Ratio Test
Attachment H:	Virginia-Specific Dual Loss Ratio Test for Policies Issued Prior to October 1, 2003
Attachment I:	Virginia-Specific 58%/85% Test
Attachment J:	Virginia-Specific 58%/85% Test for Policies Issued On or After October 1, 2003

Enclosures: Updated Filing Materials

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Attachment A-1-a
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1997	1,404	0	0	1,242	0%	88%	23	0%
	1998	365,019	0	0	45,109	0%	12%	789	0%
	1999	1,713,969	43,198	0	431,733	3%	28%	2,809	2%
	2000	3,837,579	190,025	30,470	1,469,962	5%	43%	4,178	4%
	2001	5,769,329	263,180	59,391	2,861,942	5%	54%	6,144	4%
	2002	8,061,447	587,804	62,957	4,318,345	7%	61%	7,817	5%
	2003	8,935,727	266,048	271,339	5,837,376	3%	68%	8,063	5%
	2004	8,879,585	1,042,726	275,365	7,183,508	12%	93%	7,799	6%
	2005	8,704,028	2,812,806	721,834	7,419,931	32%	118%	7,873	11%
	2006	9,020,458	2,413,614	1,077,814	7,315,546	27%	108%	8,007	13%
	2007	9,014,480	1,492,466	1,706,828	7,905,047	17%	104%	7,794	13%
	2008	8,667,854	2,161,777	2,000,233	7,874,623	25%	116%	7,381	15%
	2009	8,172,226	3,667,697	2,150,547	6,443,269	45%	124%	6,889	17%
	2010	7,698,751	3,210,203	2,393,503	6,891,619	42%	131%	6,559	19%
	2011	7,291,990	5,251,972	3,080,260	6,375,324	72%	159%	6,248	22%
	2012	6,941,214	3,715,624	3,825,918	6,526,165	54%	148%	5,968	24%
	2013	6,580,749	5,070,207	4,276,726	6,696,594	77%	179%	5,699	26%
	2014	6,127,205	5,223,321	4,718,039	1,514,328	85%	110%	5,096	28%
	2015	5,481,754	4,835,781	5,578,838	2,429,546	88%	133%	4,699	30%
	2016	5,038,810	6,626,641	5,928,347	3,909,045	132%	209%	4,424	33%
Projected Future Experience (50 Years)	2017	4,723,534	5,819,815	4,325,086	3,540,955	123%	198%	4,179	35%
	2018	4,424,570	6,298,174	5,151,804	2,868,594	142%	207%	3,934	37%
	2019	4,127,129	6,745,095	5,768,533	2,146,633	163%	215%	3,688	40%
	2020	3,832,670	7,136,900	6,310,028	1,406,377	186%	223%	3,443	42%
	2021	3,542,965	7,486,263	6,812,062	661,626	211%	230%	3,202	44%
	2022	3,259,640	7,819,432	7,254,824	-78,803	240%	237%	2,964	47%
	2023	2,984,216	8,145,457	7,652,385	-810,089	273%	246%	2,731	49%
	2024	2,718,112	8,441,884	8,027,749	-1,505,746	311%	255%	2,505	51%
	2025	2,462,732	8,708,568	8,386,519	-2,142,930	354%	267%	2,286	54%
	2026	2,219,303	8,923,071	8,723,740	-2,713,753	402%	280%	2,076	56%
	2027	1,988,861	9,058,905	9,018,709	-3,205,953	455%	294%	1,876	58%
	2028	1,772,335	9,116,344	9,260,386	-3,627,003	514%	310%	1,686	61%
	2029	1,570,491	9,091,076	9,439,897	-3,971,998	579%	326%	1,509	63%
	2030	1,383,942	8,974,149	9,548,817	-4,234,086	648%	343%	1,343	65%
	2031	1,212,960	8,777,403	9,582,198	-4,419,569	724%	359%	1,190	67%
	2032	1,057,322	8,572,237	9,550,927	-4,553,202	811%	380%	1,049	68%
	2033	916,434	8,373,804	9,470,747	-4,643,081	914%	407%	920	70%
	2034	789,829	8,135,255	9,345,993	-4,684,129	1,030%	437%	803	72%
	2035	677,070	7,854,024	9,177,104	-4,668,395	1,160%	471%	698	73%
	2036	577,497	7,535,615	8,965,153	-4,603,952	1,305%	508%	604	74%
	2037	490,214	7,184,094	8,711,920	-4,496,227	1,466%	548%	520	76%
	2038	414,228	6,808,332	8,420,593	-4,348,154	1,644%	594%	446	77%
	2039	348,470	6,421,648	8,096,504	-4,173,261	1,843%	645%	381	78%
	2040	291,919	6,022,254	7,744,547	-3,968,014	2,063%	704%	325	79%
	2041	243,573	5,614,079	7,369,058	-3,744,145	2,305%	768%	275	80%
	2042	202,430	5,194,982	6,973,307	-3,505,204	2,566%	835%	233	80%
	2043	167,582	4,770,512	6,560,902	-3,251,652	2,847%	906%	196	81%
	2044	138,227	4,357,216	6,137,891	-2,998,365	3,152%	983%	165	81%
	2045	113,588	3,956,045	5,710,278	-2,747,181	3,483%	1064%	138	82%
	2046	92,999	3,572,402	5,283,451	-2,497,819	3,841%	1155%	115	82%
	2047	75,907	3,209,084	4,862,506	-2,256,331	4,228%	1255%	96	83%
	2048	61,763	2,868,036	4,452,038	-2,028,036	4,644%	1360%	80	83%
	2049	50,103	2,553,374	4,056,287	-1,813,814	5,096%	1476%	66	83%
	2050	40,561	2,265,640	3,678,798	-1,615,173	5,586%	1604%	55	84%
	2051	32,787	2,001,935	3,321,664	-1,431,686	6,106%	1739%	46	84%
	2052	26,460	1,757,738	2,985,570	-1,262,021	6,643%	1873%	38	84%
	2053	21,333	1,537,078	2,671,465	-1,108,306	7,205%	2010%	31	84%
	2054	17,185	1,340,282	2,380,246	-968,871	7,799%	2161%	26	84%
	2055	13,838	1,168,472	2,112,813	-846,428	8,444%	2327%	21	84%
	2056	11,146	1,018,826	1,869,335	-737,569	9,141%	2523%	17	84%
	2057-2061	30,493	3,369,774	6,447,358	-2,470,278	11,051%	2950%	50	85%
	2062-2066	10,339	1,552,394	3,209,121	-1,203,873	15,015%	3371%	18	85%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	190,403,807	62,555,788	46,696,501	93,450,255	33%	82%
Future	36,212,086	129,468,776	136,422,755	-93,366,952	358%	100%
Lifetime	226,615,893	192,024,564	183,119,256	83,303	85%	85%

Attachment A-1-b
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Increase - After Requested Rate Increase
515 Series

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1997	1,404	0	0	1,242	0%	88%	23	0%
	1998	365,019	0	0	45,109	0%	12%	789	0%
	1999	1,713,969	43,198	0	431,733	3%	28%	2,809	2%
	2000	3,837,579	190,025	30,470	1,469,962	5%	43%	4,178	4%
	2001	5,769,329	263,180	59,391	2,861,942	5%	54%	6,144	4%
	2002	8,061,447	587,804	62,957	4,318,345	7%	61%	7,817	5%
	2003	8,935,727	266,048	271,339	5,837,376	3%	68%	8,063	5%
	2004	8,879,585	1,042,726	275,365	7,183,508	12%	93%	7,799	6%
	2005	8,704,028	2,812,806	721,834	7,419,931	32%	118%	7,873	11%
	2006	9,020,458	2,413,614	1,077,814	7,315,546	27%	108%	8,007	13%
	2007	9,014,480	1,492,466	1,706,828	7,905,047	17%	104%	7,794	13%
	2008	8,667,854	2,161,777	2,000,233	7,874,623	25%	116%	7,381	15%
	2009	8,172,226	3,667,697	2,150,547	6,443,269	45%	124%	6,889	17%
	2010	7,698,751	3,210,203	2,393,503	6,891,619	42%	131%	6,559	19%
	2011	7,291,990	5,251,972	3,080,260	6,375,324	72%	159%	6,248	22%
	2012	6,941,214	3,715,624	3,825,918	6,526,165	54%	148%	5,968	24%
	2013	6,580,749	5,070,207	4,276,726	6,696,594	77%	179%	5,699	26%
	2014	6,127,205	5,223,321	4,718,039	1,514,328	85%	110%	5,096	28%
	2015	5,481,754	4,835,781	5,578,838	2,429,546	88%	133%	4,699	30%
	2016	5,038,810	6,626,641	5,928,347	3,909,045	132%	209%	4,424	33%
Projected Future Experience (50 Years)	2017	4,723,534	5,819,815	4,325,086	3,540,955	123%	198%	4,179	35%
	2018	4,736,968	6,236,913	5,139,603	-4,396,400	132%	39%	3,824	37%
	2019	6,086,897	6,318,576	5,670,930	-6,283,935	104%	1%	3,476	39%
	2020	5,955,212	6,597,785	6,100,822	1,022,958	111%	128%	3,243	41%
	2021	5,528,996	6,893,800	6,498,584	391,938	125%	132%	3,013	42%
	2022	5,109,663	7,171,757	6,846,323	-231,336	140%	136%	2,787	44%
	2023	4,699,439	7,440,478	7,155,814	-842,720	158%	140%	2,566	46%
	2024	4,300,464	7,679,783	7,448,541	-1,420,119	179%	146%	2,351	48%
	2025	3,914,945	7,890,498	7,729,954	-1,944,828	202%	152%	2,144	50%
	2026	3,544,895	8,053,079	7,995,272	-2,410,722	227%	159%	1,945	51%
	2027	3,192,136	8,144,556	8,224,101	-2,808,466	255%	167%	1,756	53%
	2028	2,858,376	8,166,295	8,405,940	-3,144,850	286%	176%	1,577	55%
	2029	2,545,119	8,115,678	8,532,799	-3,416,693	319%	185%	1,410	57%
	2030	2,253,653	7,985,144	8,597,570	-3,618,829	354%	194%	1,254	58%
	2031	1,984,763	7,785,569	8,596,259	-3,756,830	392%	203%	1,110	60%
	2032	1,738,434	7,580,616	8,538,889	-3,852,172	436%	214%	977	61%
	2033	1,514,053	7,383,753	8,439,707	-3,911,895	488%	229%	856	62%
	2034	1,311,178	7,153,547	8,302,789	-3,931,976	546%	246%	747	64%
	2035	1,129,393	6,888,335	8,128,811	-3,906,187	610%	264%	648	65%
	2036	967,904	6,593,040	7,918,981	-3,841,330	681%	284%	560	66%
	2037	825,509	6,271,486	7,675,117	-3,742,115	760%	306%	482	67%
	2038	700,801	5,931,329	7,400,203	-3,611,179	846%	331%	413	68%
	2039	592,243	5,584,059	7,099,012	-3,459,456	943%	359%	353	68%
	2040	498,340	5,228,013	6,775,877	-3,284,039	1,049%	390%	300	69%
	2041	417,611	4,866,191	6,434,542	-3,094,280	1,165%	424%	254	70%
	2042	348,532	4,496,604	6,077,783	-2,893,096	1,290%	460%	215	70%
	2043	289,708	4,123,925	5,708,638	-2,680,826	1,423%	498%	181	71%
	2044	239,886	3,762,218	5,332,217	-2,469,422	1,568%	539%	152	71%
	2045	197,874	3,412,180	4,953,570	-2,260,400	1,724%	582%	127	72%
	2046	162,599	3,078,133	4,577,180	-2,053,428	1,893%	630%	106	72%
	2047	133,188	2,762,436	4,207,277	-1,853,440	2,074%	682%	88	72%
	2048	108,744	2,466,629	3,847,666	-1,664,693	2,268%	737%	73	73%
	2049	88,514	2,194,100	3,501,843	-1,487,815	2,479%	798%	61	73%
	2050	71,889	1,945,323	3,172,731	-1,324,029	2,706%	864%	50	73%
	2051	58,284	1,717,667	2,862,011	-1,172,923	2,947%	935%	42	73%
	2052	47,171	1,507,194	2,570,161	-1,033,390	3,195%	1004%	34	73%
	2053	38,133	1,317,254	2,297,888	-907,105	3,454%	1076%	28	73%
	2054	30,791	1,148,050	2,045,859	-792,676	3,729%	1154%	23	74%
	2055	24,848	1,000,480	1,814,750	-692,277	4,026%	1240%	19	74%
	2056	20,051	872,038	1,604,616	-603,090	4,349%	1341%	16	74%
	2057-2061	55,003	2,882,569	5,526,838	-2,019,114	5,241%	1570%	46	74%
	2062-2066	18,622	1,327,342	2,746,649	-983,876	7,128%	1844%	16	74%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	190,403,807	62,555,788	46,696,501	93,450,255	33%	82%
Future	52,336,028	117,046,463	124,515,058	-93,382,185	224%	45%
Lifetime	242,739,835	179,602,251	171,211,559	68,070	74%	74%

Attachment A-2-a
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series with No Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1997	860	0	0	1,057	0%	123%	13	0%
	1998	204,780	0	0	33,496	0%	16%	487	0%
	1999	968,043	43,198	0	204,624	4%	26%	1,661	4%
	2000	1,947,084	23,819	7,643	588,888	1%	31%	2,182	2%
	2001	2,680,474	117,347	22,306	1,028,555	4%	43%	2,981	3%
	2002	3,665,138	414,476	22,734	1,384,228	11%	49%	3,752	6%
	2003	4,014,848	80,217	205,161	1,780,017	2%	46%	3,871	5%
	2004	3,997,913	496,384	191,304	1,933,767	12%	61%	3,789	7%
	2005	3,977,347	1,355,694	269,244	1,962,218	34%	83%	3,927	11%
	2006	4,245,837	1,552,824	419,322	1,872,867	37%	81%	4,037	15%
	2007	4,216,703	696,586	855,811	1,994,942	17%	64%	3,889	15%
	2008	4,009,313	1,315,063	1,073,234	1,860,778	33%	79%	3,669	17%
	2009	3,747,353	1,896,974	1,279,569	1,186,278	51%	82%	3,387	20%
	2010	3,493,442	1,619,270	1,417,774	1,268,070	46%	83%	3,201	21%
	2011	3,271,982	2,704,756	1,838,581	911,213	83%	111%	3,019	25%
	2012	3,076,728	1,585,386	2,148,703	844,755	52%	79%	2,850	26%
	2013	2,859,329	2,503,608	2,318,091	757,296	88%	114%	2,686	29%
	2014	2,587,875	2,944,068	2,669,441	-1,094,213	114%	71%	2,316	32%
	2015	2,222,591	2,307,999	2,958,418	-451,081	104%	84%	2,101	34%
	2016	1,987,360	3,168,081	3,047,834	-385	159%	159%	1,956	37%
Projected Future Experience (50 Years)	2017	1,833,962	2,402,927	1,820,421	-148,172	131%	123%	1,825	39%
	2018	1,688,273	2,473,432	2,112,770	-338,616	147%	126%	1,695	41%
	2019	1,545,590	2,515,474	2,301,262	-514,836	163%	129%	1,566	42%
	2020	1,406,909	2,519,270	2,435,692	-668,596	179%	132%	1,440	44%
	2021	1,273,216	2,492,457	2,533,682	-797,861	196%	133%	1,316	46%
	2022	1,145,329	2,446,379	2,586,017	-904,272	214%	135%	1,196	47%
	2023	1,023,962	2,385,125	2,599,611	-986,685	233%	137%	1,081	49%
	2024	909,711	2,302,192	2,586,273	-1,042,354	253%	138%	971	50%
	2025	803,060	2,204,263	2,551,189	-1,070,852	274%	141%	867	52%
	2026	704,341	2,090,492	2,496,805	-1,073,823	297%	144%	770	53%
	2027	613,690	1,959,781	2,420,712	-1,054,846	319%	147%	679	54%
	2028	531,146	1,817,875	2,324,652	-1,017,706	342%	151%	595	55%
	2029	456,631	1,671,039	2,211,788	-966,818	366%	154%	518	56%
	2030	389,988	1,518,685	2,085,007	-904,461	389%	157%	448	56%
	2031	330,900	1,363,711	1,947,056	-832,985	412%	160%	386	57%
	2032	278,909	1,218,629	1,802,603	-759,393	437%	165%	330	58%
	2033	233,442	1,085,343	1,656,322	-686,074	465%	171%	280	58%
	2034	194,002	956,835	1,510,577	-613,649	493%	177%	236	58%
	2035	160,129	836,497	1,367,371	-543,506	522%	183%	198	59%
	2036	131,316	725,218	1,228,578	-476,826	552%	189%	166	59%
	2037	107,020	624,698	1,095,995	-415,150	584%	196%	138	59%
	2038	86,716	535,184	971,116	-359,816	617%	202%	114	59%
	2039	69,873	457,025	855,122	-310,315	654%	210%	94	60%
	2040	56,010	389,265	748,746	-266,503	695%	219%	77	60%
	2041	44,673	329,685	652,071	-227,227	738%	229%	63	60%
	2042	35,456	277,549	564,873	-192,618	783%	240%	51	60%
	2043	28,010	232,564	486,834	-162,479	830%	250%	41	60%
	2044	22,044	194,049	417,529	-135,852	880%	264%	33	60%
	2045	17,261	161,272	356,420	-112,835	934%	281%	27	60%
	2046	13,456	132,541	302,729	-92,880	985%	295%	21	60%
	2047	10,444	108,043	255,763	-75,983	1,035%	307%	17	60%
	2048	8,069	87,269	214,883	-61,707	1,081%	317%	14	60%
	2049	6,205	69,585	179,440	-49,587	1,121%	322%	11	60%
	2050	4,758	55,258	148,938	-39,571	1,161%	330%	9	60%
	2051	3,647	43,534	122,880	-31,321	1,194%	335%	7	60%
	2052	2,790	34,212	100,800	-24,724	1,226%	340%	6	60%
	2053	2,134	26,896	82,258	-19,452	1,260%	349%	4	60%
	2054	1,635	21,256	66,831	-15,347	1,300%	361%	4	60%
	2055	1,256	17,023	54,129	-12,202	1,356%	384%	3	60%
	2056	968	13,688	43,748	-9,797	1,415%	402%	2	60%
	2057-2061	2,482	40,589	121,239	-28,685	1,635%	480%	6	60%
	2062-2066	873	18,700	45,612	-13,302	2,141%	618%	2	60%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	86,871,261	31,907,211	25,356,071	18,067,372	37%	58%
Future	12,422,407	27,974,146	31,946,647	-18,066,376	225%	80%
Lifetime	99,293,668	59,881,357	57,302,718	996	60%	60%

Attachment A-2-b
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Increase - After Requested Rate Increase
515 Series with No Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1997	860	0	0	1,057	0%	123%	13	0%
	1998	204,780	0	0	33,496	0%	16%	487	0%
	1999	968,043	43,198	0	204,624	4%	26%	1,661	4%
	2000	1,947,084	23,819	7,643	588,888	1%	31%	2,182	2%
	2001	2,680,474	117,347	22,306	1,028,555	4%	43%	2,981	3%
	2002	3,665,138	414,476	22,734	1,384,228	11%	49%	3,752	6%
	2003	4,014,848	80,217	205,161	1,780,017	2%	46%	3,871	5%
	2004	3,997,913	496,384	191,304	1,933,767	12%	61%	3,789	7%
	2005	3,977,347	1,355,694	269,244	1,962,218	34%	83%	3,927	11%
	2006	4,245,837	1,552,824	419,322	1,872,867	37%	81%	4,037	15%
	2007	4,216,703	696,586	855,811	1,994,942	17%	64%	3,889	15%
	2008	4,009,313	1,315,063	1,073,234	1,860,778	33%	79%	3,669	17%
	2009	3,747,353	1,896,974	1,279,569	1,186,278	51%	82%	3,387	20%
	2010	3,493,442	1,619,270	1,417,774	1,268,070	46%	83%	3,201	21%
	2011	3,271,982	2,704,756	1,838,581	911,213	83%	111%	3,019	25%
	2012	3,076,728	1,585,386	2,148,703	844,755	52%	79%	2,850	26%
	2013	2,859,329	2,503,608	2,318,091	757,296	88%	114%	2,686	29%
	2014	2,587,875	2,944,068	2,669,441	-1,094,213	114%	71%	2,316	32%
	2015	2,222,591	2,307,999	2,958,418	-451,081	104%	84%	2,101	34%
	2016	1,987,360	3,168,081	3,047,834	-385	159%	159%	1,956	37%
Projected Future Experience (50 Years)	2017	1,833,962	2,402,927	1,820,421	-148,172	131%	123%	1,825	39%
	2018	1,688,273	2,473,432	2,112,770	-338,616	147%	126%	1,695	41%
	2019	1,545,590	2,515,474	2,301,262	-514,836	163%	129%	1,566	42%
	2020	1,406,909	2,519,270	2,435,692	-668,596	179%	132%	1,440	44%
	2021	1,273,216	2,492,457	2,533,682	-797,861	196%	133%	1,316	46%
	2022	1,145,329	2,446,379	2,586,017	-904,272	214%	135%	1,196	47%
	2023	1,023,962	2,385,125	2,599,611	-986,685	233%	137%	1,081	49%
	2024	909,711	2,302,192	2,586,273	-1,042,354	253%	138%	971	50%
	2025	803,060	2,204,263	2,551,189	-1,070,852	274%	141%	867	52%
	2026	704,341	2,090,492	2,496,805	-1,073,823	297%	144%	770	53%
	2027	613,690	1,959,781	2,420,712	-1,054,846	319%	147%	679	54%
	2028	531,146	1,817,875	2,324,652	-1,017,706	342%	151%	595	55%
	2029	456,631	1,671,039	2,211,788	-966,818	366%	154%	518	56%
	2030	389,988	1,518,685	2,085,007	-904,461	389%	157%	448	56%
	2031	330,900	1,363,711	1,947,056	-832,985	412%	160%	386	57%
	2032	278,909	1,218,629	1,802,603	-759,393	437%	165%	330	58%
	2033	233,442	1,085,343	1,656,322	-686,074	465%	171%	280	58%
	2034	194,002	956,835	1,510,577	-613,649	493%	177%	236	58%
	2035	160,129	836,497	1,367,371	-543,506	522%	183%	198	59%
	2036	131,316	725,218	1,228,578	-476,826	552%	189%	166	59%
	2037	107,020	624,698	1,095,995	-415,150	584%	196%	138	59%
	2038	86,716	535,184	971,116	-359,816	617%	202%	114	59%
	2039	69,873	457,025	855,122	-310,315	654%	210%	94	60%
	2040	56,010	389,265	748,746	-266,503	695%	219%	77	60%
	2041	44,673	329,685	652,071	-227,227	738%	229%	63	60%
	2042	35,456	277,549	564,873	-192,618	783%	240%	51	60%
	2043	28,010	232,564	486,834	-162,479	830%	250%	41	60%
	2044	22,044	194,049	417,529	-135,852	880%	264%	33	60%
	2045	17,261	161,272	356,420	-112,835	934%	281%	27	60%
	2046	13,456	132,541	302,729	-92,880	985%	295%	21	60%
	2047	10,444	108,043	255,763	-75,983	1,035%	307%	17	60%
	2048	8,069	87,269	214,883	-61,707	1,081%	317%	14	60%
	2049	6,205	69,585	179,440	-49,587	1,121%	322%	11	60%
	2050	4,758	55,258	148,938	-39,571	1,161%	330%	9	60%
	2051	3,647	43,534	122,880	-31,321	1,194%	335%	7	60%
	2052	2,790	34,212	100,800	-24,724	1,226%	340%	6	60%
	2053	2,134	26,896	82,258	-19,452	1,260%	349%	4	60%
	2054	1,635	21,256	66,831	-15,347	1,300%	361%	4	60%
	2055	1,256	17,023	54,129	-12,202	1,356%	384%	3	60%
	2056	968	13,688	43,748	-9,797	1,415%	402%	2	60%
	2057-2061	2,482	40,589	121,239	-28,685	1,635%	480%	6	60%
	2062-2066	873	18,700	45,612	-13,302	2,141%	618%	2	60%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	86,871,261	31,907,211	25,356,071	18,067,372	37%	58%
Future	12,422,407	27,974,146	31,946,647	-18,066,400	225%	80%
Lifetime	99,293,668	59,881,357	57,302,718	972	60%	60%

Attachment A-3-a
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1997	544	0	0	185	0%	34%	10	0%
	1998	160,240	0	0	11,613	0%	7%	302	0%
	1999	745,926	0	0	227,108	0%	30%	1,148	0%
	2000	1,890,495	166,207	22,826	881,075	9%	55%	1,996	6%
	2001	3,088,855	145,833	37,085	1,833,387	5%	64%	3,163	5%
	2002	4,396,309	173,328	40,224	2,934,117	4%	71%	4,065	5%
	2003	4,920,879	185,832	66,178	4,057,359	4%	86%	4,192	4%
	2004	4,881,672	546,341	84,061	5,249,741	11%	119%	4,010	6%
	2005	4,726,680	1,457,112	452,590	5,457,713	31%	146%	3,946	10%
	2006	4,774,621	860,790	658,492	5,442,679	18%	132%	3,970	11%
	2007	4,797,776	795,879	851,017	5,910,104	17%	140%	3,905	12%
	2008	4,658,541	846,713	926,999	6,013,845	18%	147%	3,712	13%
	2009	4,424,872	1,770,724	870,978	5,256,991	40%	159%	3,502	15%
	2010	4,205,309	1,590,933	975,729	5,623,549	38%	172%	3,358	17%
	2011	4,020,008	2,547,215	1,241,678	5,464,111	63%	199%	3,229	19%
	2012	3,864,486	2,130,238	1,677,215	5,681,410	55%	202%	3,118	21%
	2013	3,721,420	2,566,599	1,958,635	5,939,298	69%	229%	3,013	24%
	2014	3,539,330	2,279,253	2,048,598	2,608,541	64%	138%	2,780	25%
	2015	3,259,163	2,527,783	2,620,420	2,880,628	78%	166%	2,598	27%
	2016	3,051,450	3,458,561	2,880,513	3,909,431	113%	241%	2,468	30%
Projected Future Experience (50 Years)	2017	2,889,572	3,416,887	2,504,665	3,689,128	118%	246%	2,354	32%
	2018	2,736,297	3,824,742	3,039,034	3,207,210	140%	257%	2,238	34%
	2019	2,581,539	4,229,621	3,467,271	2,661,469	164%	267%	2,121	37%
	2020	2,425,762	4,617,630	3,874,336	2,074,973	190%	276%	2,004	40%
	2021	2,269,749	4,993,806	4,278,380	1,459,488	220%	284%	1,885	43%
	2022	2,114,311	5,373,053	4,668,807	825,469	254%	293%	1,767	46%
	2023	1,960,254	5,760,332	5,052,774	176,596	294%	303%	1,650	49%
	2024	1,808,401	6,139,691	5,441,476	-463,392	340%	314%	1,533	52%
	2025	1,659,672	6,504,305	5,835,330	-1,072,077	392%	327%	1,418	55%
	2026	1,514,962	6,832,579	6,226,935	-1,639,930	451%	343%	1,306	59%
	2027	1,375,171	7,099,124	6,597,997	-2,151,107	516%	360%	1,197	62%
	2028	1,241,189	7,298,468	6,935,734	-2,609,297	588%	378%	1,092	65%
	2029	1,113,860	7,420,036	7,228,109	-3,005,179	666%	396%	991	68%
	2030	993,955	7,455,464	7,463,810	-3,329,624	750%	415%	895	71%
	2031	882,060	7,413,692	7,635,142	-3,586,584	840%	434%	804	74%
	2032	778,413	7,353,608	7,748,324	-3,793,808	945%	457%	720	77%
	2033	682,993	7,288,461	7,814,426	-3,957,007	1,067%	488%	640	79%
	2034	595,827	7,178,420	7,835,416	-4,070,480	1,205%	522%	567	82%
	2035	516,941	7,017,528	7,809,732	-4,124,889	1,358%	560%	500	84%
	2036	446,180	6,810,397	7,736,575	-4,127,126	1,526%	601%	438	86%
	2037	383,194	6,559,396	7,615,926	-4,081,077	1,712%	647%	383	88%
	2038	327,512	6,273,149	7,449,477	-3,988,338	1,915%	698%	333	90%
	2039	278,597	5,964,623	7,241,382	-3,862,946	2,141%	754%	288	92%
	2040	235,909	5,632,989	6,995,802	-3,701,511	2,388%	819%	248	93%
	2041	198,900	5,284,394	6,716,987	-3,516,918	2,657%	889%	213	95%
	2042	166,974	4,917,433	6,408,434	-3,312,586	2,945%	961%	182	96%
	2043	139,572	4,537,948	6,074,068	-3,089,173	3,251%	1038%	155	97%
	2044	116,182	4,163,167	5,720,363	-2,862,512	3,583%	1119%	132	98%
	2045	96,327	3,794,772	5,353,859	-2,634,347	3,939%	1205%	111	99%
	2046	79,543	3,439,861	4,980,722	-2,404,939	4,325%	1301%	94	100%
	2047	65,464	3,101,041	4,606,742	-2,180,348	4,737%	1406%	79	100%
	2048	53,693	2,780,767	4,237,155	-1,966,329	5,179%	1517%	66	101%
	2049	43,898	2,483,789	3,876,847	-1,764,226	5,658%	1639%	55	101%
	2050	35,803	2,210,382	3,529,860	-1,575,602	6,174%	1773%	46	102%
	2051	29,139	1,958,401	3,198,784	-1,400,365	6,721%	1915%	39	102%
	2052	23,670	1,723,525	2,884,769	-1,237,297	7,282%	2054%	32	102%
	2053	19,199	1,510,182	2,589,207	-1,088,855	7,866%	2194%	27	103%
	2054	15,550	1,319,026	2,313,415	-953,524	8,483%	2351%	22	103%
	2055	12,582	1,151,449	2,058,684	-834,225	9,151%	2521%	18	103%
	2056	10,178	1,005,138	1,825,587	-727,773	9,876%	2725%	15	103%
	2057-2061	28,011	3,329,185	6,326,119	-2,441,593	11,885%	3169%	44	104%
	2062-2066	9,466	1,533,694	3,163,509	-1,190,570	16,202%	3625%	16	104%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	103,532,546	30,648,577	21,340,430	75,382,883	30%	102%
Future	23,789,680	101,494,630	104,476,108	-75,300,576	427%	110%
Lifetime	127,322,226	132,143,207	125,816,538	82,307	104%	104%

Attachment A-3-b
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Increase - After Requested Rate Increase
515 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1997	544	0	0	185	0%	34%	10	0%
	1998	160,240	0	0	11,613	0%	7%	302	0%
	1999	745,926	0	0	227,108	0%	30%	1,148	0%
	2000	1,890,495	166,207	22,826	881,075	9%	55%	1,996	6%
	2001	3,088,855	145,833	37,085	1,833,387	5%	64%	3,163	5%
	2002	4,396,309	173,328	40,224	2,934,117	4%	71%	4,065	5%
	2003	4,920,879	185,832	66,178	4,057,359	4%	86%	4,192	4%
	2004	4,881,672	546,341	84,061	5,249,741	11%	119%	4,010	6%
	2005	4,726,680	1,457,112	452,590	5,457,713	31%	146%	3,946	10%
	2006	4,774,621	860,790	658,492	5,442,679	18%	132%	3,970	11%
	2007	4,797,776	795,879	851,017	5,910,104	17%	140%	3,905	12%
	2008	4,658,541	846,713	926,999	6,013,845	18%	147%	3,712	13%
	2009	4,424,872	1,770,724	870,978	5,256,991	40%	159%	3,502	15%
	2010	4,205,309	1,590,933	975,729	5,623,549	38%	172%	3,358	17%
	2011	4,020,008	2,547,215	1,241,678	5,464,111	63%	199%	3,229	19%
	2012	3,864,486	2,130,238	1,677,215	5,681,410	55%	202%	3,118	21%
	2013	3,721,420	2,566,599	1,958,635	5,939,298	69%	229%	3,013	24%
	2014	3,539,330	2,279,253	2,048,598	2,608,541	64%	138%	2,780	25%
	2015	3,259,163	2,527,783	2,620,420	2,880,628	78%	166%	2,598	27%
	2016	3,051,450	3,458,561	2,880,513	3,909,431	113%	241%	2,468	30%
Projected Future Experience (50 Years)	2017	2,889,572	3,416,887	2,504,665	3,689,128	118%	246%	2,354	32%
	2018	3,048,695	3,763,481	3,026,833	-4,057,784	123%	-10%	2,129	34%
	2019	4,541,308	3,803,102	3,369,668	-5,769,099	84%	-43%	1,909	36%
	2020	4,548,304	4,078,514	3,665,130	1,691,554	90%	127%	1,803	38%
	2021	4,255,780	4,401,343	3,964,902	1,189,800	103%	131%	1,697	40%
	2022	3,964,334	4,725,378	4,260,305	672,936	119%	136%	1,590	42%
	2023	3,675,477	5,055,354	4,556,203	143,964	138%	141%	1,485	44%
	2024	3,390,753	5,377,590	4,862,267	-377,765	159%	147%	1,380	46%
	2025	3,111,885	5,686,235	5,178,765	-873,976	183%	155%	1,277	48%
	2026	2,840,554	5,962,588	5,498,467	-1,336,899	210%	163%	1,176	51%
	2027	2,578,446	6,184,775	5,803,389	-1,753,620	240%	172%	1,077	53%
	2028	2,327,230	6,348,420	6,081,288	-2,127,144	273%	181%	983	55%
	2029	2,088,487	6,444,639	6,321,012	-2,449,875	309%	191%	892	57%
	2030	1,863,665	6,466,458	6,512,563	-2,714,368	347%	201%	805	60%
	2031	1,653,863	6,421,858	6,649,202	-2,923,846	388%	212%	724	62%
	2032	1,459,525	6,361,986	6,736,286	-3,092,778	436%	224%	648	64%
	2033	1,280,611	6,298,410	6,783,386	-3,225,821	492%	240%	576	65%
	2034	1,117,176	6,196,712	6,792,212	-3,318,326	555%	258%	510	67%
	2035	969,264	6,051,839	6,761,439	-3,362,681	624%	277%	450	69%
	2036	836,588	5,867,821	6,690,403	-3,364,505	701%	299%	394	71%
	2037	718,488	5,646,788	6,579,122	-3,326,965	786%	323%	344	72%
	2038	614,086	5,396,146	6,429,087	-3,251,363	879%	349%	299	73%
	2039	522,369	5,127,034	6,243,890	-3,149,141	981%	379%	259	75%
	2040	442,330	4,838,748	6,027,131	-3,017,536	1,094%	412%	223	76%
	2041	372,938	4,536,506	5,782,471	-2,867,053	1,216%	448%	192	77%
	2042	313,076	4,219,054	5,512,910	-2,700,478	1,348%	485%	164	78%
	2043	261,698	3,891,361	5,221,804	-2,518,348	1,487%	525%	140	79%
	2044	217,842	3,568,169	4,914,689	-2,333,570	1,638%	567%	118	79%
	2045	180,613	3,250,908	4,597,151	-2,147,565	1,800%	611%	100	80%
	2046	149,143	2,945,592	4,274,451	-1,960,548	1,975%	660%	85	80%
	2047	122,744	2,654,393	3,951,514	-1,777,458	2,163%	714%	71	81%
	2048	100,674	2,379,360	3,632,783	-1,602,986	2,363%	771%	60	81%
	2049	82,309	2,124,515	3,322,403	-1,438,228	2,581%	834%	50	82%
	2050	67,130	1,890,065	3,023,793	-1,284,458	2,816%	902%	42	82%
	2051	54,636	1,674,133	2,739,131	-1,141,602	3,064%	975%	35	82%
	2052	44,381	1,472,982	2,469,360	-1,008,666	3,319%	1046%	29	82%
	2053	35,999	1,290,358	2,215,630	-887,653	3,584%	1119%	24	83%
	2054	29,156	1,126,795	1,979,028	-777,329	3,865%	1199%	20	83%
	2055	23,592	983,457	1,760,621	-680,075	4,169%	1286%	17	83%
	2056	19,084	858,350	1,560,868	-593,293	4,498%	1389%	14	83%
	2057-2061	52,521	2,841,980	5,405,599	-1,990,429	5,411%	1621%	40	83%
	2062-2066	17,749	1,308,641	2,701,037	-970,574	7,373%	1905%	14	83%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	103,532,546	30,648,577	21,340,430	75,382,883	30%	102%
Future	39,913,621	89,072,317	92,568,411	-75,315,785	223%	34%
Lifetime	143,446,167	119,720,894	113,908,841	67,098	83%	84%

Attachment B-1
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series

1	Accumulated value of current earned premium	190,403,807	x	68%	=	129,719,808
2	Present value of future projected current earned premium	32,803,958	x	68%	=	22,348,940
3a	Present value of future projected premium	52,336,028				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	19,532,070	x	80%	=	15,625,656
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**167,694,403**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					62,555,788
5b	Present value of future projected incurred claims without the inclusion of active life reserves					117,046,463
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**179,602,251**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment B-2
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with No Inflation Protection

1	Accumulated value of current earned premium	86,871,261	x	64%	=	56,001,156
2	Present value of future projected current earned premium	12,422,407	x	64%	=	8,008,047
3a	Present value of future projected premium	12,422,407				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	0	x	80%	=	0
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**64,009,203**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					31,907,211
5b	Present value of future projected incurred claims without the inclusion of active life reserves					27,974,146
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**59,881,357**
7	Test: 6 is not less than 4					Fail

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment B-3
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with Inflation Protection

1	Accumulated value of current earned premium	103,532,546	x	71%	=	73,578,822
2	Present value of future projected current earned premium	20,384,626	x	71%	=	14,487,008
3a	Present value of future projected premium	39,913,621				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	19,528,995	x	80%	=	15,623,196
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**103,689,025**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					30,648,577
5b	Present value of future projected incurred claims without the inclusion of active life reserves					89,072,317
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**119,720,894**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment C-1
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series Issued Prior to October 1, 2003

1	Accumulated value of current earned premium	170,473,010	x	68%	=	116,373,838
2	Present value of future projected current earned premium	25,632,226	x	68%	=	17,497,905
3a	Present value of future projected premium	41,711,888				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	16,079,662	x	80%	=	12,863,729
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**146,735,472**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					58,339,841
5b	Present value of future projected incurred claims without the inclusion of active life reserves					99,912,258
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**158,252,099**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which is 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment C-2
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with No Inflation Protection Issued Prior to October 1, 2003

1	Accumulated value of current earned premium	75,904,035	x	64%	=	48,782,323
2	Present value of future projected current earned premium	8,664,899	x	64%	=	5,568,793
3a	Present value of future projected premium	8,664,899				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	0	x	80%	=	0
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**54,351,116**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					29,164,790
5b	Present value of future projected incurred claims without the inclusion of active life reserves					21,311,570
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**50,476,360**
7	Test: 6 is not less than 4					Fail

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which is 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment C-3
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with Inflation Protection Issued Prior to October 1, 2003

1	Accumulated value of current earned premium	94,568,976	x	71%	=	67,396,982
2	Present value of future projected current earned premium	16,967,327	x	71%	=	12,092,197
3a	Present value of future projected premium	33,046,989				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	16,079,662	x	80%	=	12,863,729
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**92,352,908**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					29,175,051
5b	Present value of future projected incurred claims without the inclusion of active life reserves					78,600,688
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**107,775,739**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which is 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment D-1
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series

1	Accumulated value of initial earned premium	190,403,807	x	58%	=	110,434,208
2a	Accumulated value of earned premium	190,403,807				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	32,803,958	x	58%	=	19,026,296
4a	Present value of future projected premium	52,336,028				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	19,532,070	x	85%	=	16,602,259
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**146,062,763**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					62,555,788
6b	Present value of future projected incurred claims without the inclusion of active life reserves					134,603,432
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**197,159,220**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment D-2
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with No Inflation Protection

1	Accumulated value of initial earned premium	86,871,261	x	58%	=	50,385,331
2a	Accumulated value of earned premium	86,871,261				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	12,422,407	x	58%	=	7,204,996
4a	Present value of future projected premium	12,422,407				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	0	x	85%	=	0
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**57,590,327**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					31,907,211
6b	Present value of future projected incurred claims without the inclusion of active life reserves					32,170,268
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**64,077,479**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment D-3
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with Inflation Protection

1	Accumulated value of initial earned premium	103,532,546	x	58%	=	60,048,877
2a	Accumulated value of earned premium	103,532,546				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	20,384,626	x	58%	=	11,823,083
4a	Present value of future projected premium	39,913,621				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	19,528,995	x	85%	=	16,599,646
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**88,471,606**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					30,648,577
6b	Present value of future projected incurred claims without the inclusion of active life reserves					102,433,164
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**133,081,741**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment E-1
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	19,930,797	x	58%	=	11,559,862
2a	Accumulated value of earned premium	19,930,797				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	7,176,161	x	58%	=	4,162,174
4a	Present value of future projected premium	10,624,140				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	3,447,979	x	85%	=	2,930,782
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**18,652,817**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					4,215,947
6b	Present value of future projected incurred claims without the inclusion of active life reserves					19,704,336
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**23,920,283**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment E-2
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with No Inflation Protection Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	10,967,226	x	58%	=	6,360,991
2a	Accumulated value of earned premium	10,967,226				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	3,757,508	x	58%	=	2,179,355
4a	Present value of future projected premium	3,757,508				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	0	x	85%	=	0
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**8,540,346**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					2,742,421
6b	Present value of future projected incurred claims without the inclusion of active life reserves					7,661,962
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**10,404,383**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment E-3
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with Inflation Protection Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	8,963,570	x	58%	=	5,198,871
2a	Accumulated value of earned premium	8,963,570				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	3,417,290	x	58%	=	1,982,028
4a	Present value of future projected premium	6,866,632				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	3,449,342	x	85%	=	2,931,941
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**10,112,840**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					1,473,526
6b	Present value of future projected incurred claims without the inclusion of active life reserves					12,042,374
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**13,515,900**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment F-1-a
MedAmerica and CICA
Actual and Projected Experience by Calendar Year
Virginia-Specific Experience Before Requested Rate Increase
515 Series

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1999	37,182	0	0	3,300	0%	9%	92	0%
	2000	115,737	0	0	40,793	0%	35%	125	0%
	2001	175,708	144,374	0	87,250	82%	132%	203	43%
	2002	287,148	0	4,725	151,735	0%	53%	303	24%
	2003	334,364	2,170	17,422	223,727	1%	68%	307	16%
	2004	332,167	19,587	37,863	276,719	6%	89%	305	14%
	2005	329,027	441	50,672	264,183	0%	80%	299	11%
	2006	330,790	2,835	47,822	266,165	1%	81%	294	9%
	2007	319,315	459	39,625	295,857	0%	93%	280	8%
	2008	307,398	8,812	11,034	263,413	3%	89%	268	8%
	2009	292,088	193,978	2,746	250,561	66%	152%	253	13%
	2010	281,272	52,547	32,629	260,451	19%	111%	241	13%
	2011	270,580	410,290	55,535	265,781	152%	250%	231	22%
	2012	258,153	132,770	112,091	225,245	51%	139%	219	23%
	2013	245,713	161,661	262,891	265,509	66%	174%	211	25%
	2014	235,541	77,282	242,159	234,015	33%	132%	204	26%
	2015	221,033	246,889	237,131	58,811	112%	138%	186	29%
	2016	196,587	547,980	249,396	101,353	279%	330%	171	36%
Projected Future Experience (50 Years)	2017	181,140	232,747	204,458	131,609	128%	201%	161	38%
	2018	168,479	248,465	230,020	106,678	147%	211%	151	41%
	2019	156,096	263,797	248,394	79,612	169%	220%	142	43%
	2020	144,047	276,086	264,115	51,371	192%	227%	132	46%
	2021	132,368	287,346	278,215	22,528	217%	234%	123	48%
	2022	121,101	298,796	290,302	-6,060	247%	242%	113	51%
	2023	110,286	310,248	301,247	-34,114	281%	250%	104	53%
	2024	99,954	320,993	312,163	-60,927	321%	260%	96	56%
	2025	90,138	331,383	323,403	-86,188	368%	272%	87	58%
	2026	80,857	340,034	334,675	-108,773	421%	286%	79	61%
	2027	72,135	344,744	344,679	-127,565	478%	301%	72	63%
	2028	63,998	345,148	352,663	-142,175	539%	317%	64	65%
	2029	56,456	342,384	358,270	-154,302	606%	333%	58	68%
	2030	49,525	335,938	361,136	-163,029	678%	349%	51	70%
	2031	43,217	326,047	360,981	-167,514	754%	367%	46	72%
	2032	37,522	314,936	358,035	-169,306	839%	388%	40	73%
	2033	32,414	303,847	352,859	-170,201	937%	412%	36	75%
	2034	27,861	291,817	345,786	-169,993	1,047%	437%	31	77%
	2035	23,839	278,588	336,946	-166,857	1,169%	469%	27	78%
	2036	20,315	264,507	326,521	-161,946	1,302%	505%	24	79%
	2037	17,248	249,981	314,748	-155,646	1,449%	547%	21	81%
	2038	14,606	236,346	302,049	-149,345	1,618%	596%	18	82%
	2039	12,333	222,898	288,719	-142,198	1,807%	654%	16	83%
	2040	10,388	208,815	274,842	-134,043	2,010%	720%	14	83%
	2041	8,734	195,447	260,667	-126,265	2,238%	792%	12	84%
	2042	7,331	181,653	246,249	-117,320	2,478%	877%	10	85%
	2043	6,146	168,167	231,683	-108,229	2,736%	975%	9	86%
	2044	5,147	154,876	217,061	-98,761	3,009%	1090%	7	86%
	2045	4,310	142,370	202,558	-90,067	3,304%	1214%	6	87%
	2046	3,607	130,973	188,404	-82,082	3,631%	1355%	5	87%
	2047	3,021	119,429	174,593	-74,480	3,953%	1488%	5	87%
	2048	2,532	108,443	161,172	-67,074	4,283%	1634%	4	88%
	2049	2,123	98,031	148,208	-60,242	4,618%	1780%	3	88%
	2050	1,782	88,920	135,860	-54,152	4,991%	1951%	3	88%
	2051	1,501	81,417	124,354	-49,085	5,426%	2155%	2	89%
	2052	1,265	75,422	113,869	-45,174	5,961%	2391%	2	89%
	2053	1,070	69,995	104,414	-41,464	6,544%	2667%	2	89%
	2054	907	65,453	95,997	-38,227	7,214%	3001%	1	89%
	2055	771	61,670	88,605	-35,753	7,994%	3360%	1	89%
	2056	656	58,639	82,212	-34,062	8,933%	3744%	1	89%
	2057-2061	2,077	249,811	340,243	-153,259	12,030%	4650%	3	90%
	2062-2066	864	153,031	238,624	-109,833	17,709%	4999%	1	90%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	6,816,815	2,462,937	1,680,872	3,534,871	36%	88%
Future	1,344,838	4,885,277	5,279,071	-3,526,927	363%	101%
Lifetime	8,161,653	7,348,214	6,959,943	7,944	90%	90%

Attachment F-1-b
MedAmerica and CICA
Actual and Projected Experience by Calendar Year
Virginia-Specific Experience After Requested Rate Increase
515 Series

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1999	37,182	0	0	3,300	0%	9%	92	0%
	2000	115,737	0	0	40,793	0%	35%	125	0%
	2001	175,708	144,374	0	87,250	82%	132%	203	43%
	2002	287,148	0	4,725	151,735	0%	53%	303	24%
	2003	334,364	2,170	17,422	223,727	1%	68%	307	16%
	2004	332,167	19,587	37,863	276,719	6%	89%	305	14%
	2005	329,027	441	50,672	264,183	0%	80%	299	11%
	2006	330,790	2,835	47,822	266,165	1%	81%	294	9%
	2007	319,315	459	39,625	295,857	0%	93%	280	8%
	2008	307,398	8,812	11,034	263,413	3%	89%	268	8%
	2009	292,088	193,978	2,746	250,561	66%	152%	253	13%
	2010	281,272	52,547	32,629	260,451	19%	111%	241	13%
	2011	270,580	410,290	55,535	265,781	152%	250%	231	22%
	2012	258,153	132,770	112,091	225,245	51%	139%	219	23%
	2013	245,713	161,661	262,891	265,509	66%	174%	211	25%
	2014	235,541	77,282	242,159	234,015	33%	132%	204	26%
	2015	221,033	246,889	237,131	58,811	112%	138%	186	29%
	2016	196,587	547,980	249,396	101,353	279%	330%	171	36%
Projected Future Experience (50 Years)	2017	181,140	232,747	204,458	131,609	128%	201%	161	38%
	2018	186,755	244,766	229,288	-247,587	131%	-2%	145	41%
	2019	240,941	245,705	244,018	-191,562	102%	22%	132	43%
	2020	231,676	254,248	255,286	36,272	110%	125%	123	44%
	2021	214,169	263,367	265,285	12,228	123%	129%	114	46%
	2022	197,154	272,538	273,624	-11,378	138%	132%	106	48%
	2023	180,686	281,631	281,078	-34,399	156%	137%	97	50%
	2024	164,820	290,045	288,705	-56,274	176%	142%	89	52%
	2025	149,611	298,115	296,847	-76,733	199%	148%	81	53%
	2026	135,101	304,589	305,214	-94,833	225%	155%	73	55%
	2027	121,339	307,506	312,536	-109,656	253%	163%	66	57%
	2028	108,377	306,658	318,121	-121,026	283%	171%	60	59%
	2029	96,249	303,070	321,648	-130,365	315%	179%	53	60%
	2030	84,995	296,316	322,810	-136,901	349%	188%	47	62%
	2031	74,652	286,634	321,374	-139,990	384%	196%	42	63%
	2032	65,225	276,008	317,562	-140,931	423%	207%	37	65%
	2033	56,687	265,542	311,886	-141,212	468%	219%	33	66%
	2034	49,006	254,384	304,652	-140,656	519%	232%	29	67%
	2035	42,156	242,310	295,986	-137,774	575%	248%	25	68%
	2036	36,103	229,623	286,055	-133,516	636%	266%	22	69%
	2037	30,792	216,654	275,068	-128,177	704%	287%	19	70%
	2038	26,178	204,543	263,388	-122,879	781%	312%	17	71%
	2039	22,181	192,657	251,264	-116,906	869%	342%	14	72%
	2040	18,741	180,282	238,760	-110,132	962%	374%	12	73%
	2041	15,800	168,577	226,085	-103,686	1,067%	411%	11	73%
	2042	13,294	156,545	213,275	-96,301	1,178%	453%	9	74%
	2043	11,168	144,810	200,405	-88,804	1,297%	501%	8	74%
	2044	9,373	133,261	187,543	-81,007	1,422%	558%	7	75%
	2045	7,862	122,409	174,830	-73,843	1,557%	618%	6	75%
	2046	6,592	112,531	162,459	-67,267	1,707%	687%	5	75%
	2047	5,531	102,551	150,419	-61,013	1,854%	751%	4	76%
	2048	4,643	93,066	138,748	-54,927	2,005%	822%	4	76%
	2049	3,899	84,085	127,494	-49,313	2,157%	892%	3	76%
	2050	3,277	76,227	116,793	-44,310	2,326%	974%	3	76%
	2051	2,765	69,757	106,832	-40,147	2,523%	1071%	2	76%
	2052	2,335	64,586	97,764	-36,933	2,766%	1184%	2	77%
	2053	1,978	59,911	89,592	-33,886	3,029%	1316%	2	77%
	2054	1,680	55,998	82,322	-31,228	3,333%	1474%	1	77%
	2055	1,431	52,739	75,940	-29,197	3,686%	1645%	1	77%
	2056	1,219	50,128	70,423	-27,806	4,111%	1831%	1	77%
	2057-2061	3,869	213,382	291,068	-125,026	5,515%	2283%	3	77%
	2062-2066	1,616	130,604	203,825	-89,552	8,080%	2540%	1	78%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	6,816,815	2,462,937	1,680,872	3,534,871	36%	88%
Future	2,015,116	4,392,312	4,807,938	-3,528,395	218%	43%
Lifetime	8,831,931	6,855,249	6,488,810	6,476	78%	78%

Attachment F-2-a
MedAmerica and CICA
Actual and Projected Experience by Calendar Year
Virginia-Specific Experience Before Requested Rate Increase
515 Series with No Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1999	20,621	0	0	1,979	0%	10%	51	0%
	2000	52,789	0	0	14,360	0%	27%	63	0%
	2001	81,018	2,564	0	31,294	3%	42%	91	2%
	2002	128,551	0	2,631	50,417	0%	39%	137	1%
	2003	150,201	1,767	0	76,340	1%	52%	140	1%
	2004	147,554	19,587	2,265	81,785	13%	69%	135	4%
	2005	146,798	0	9,315	74,651	0%	51%	137	3%
	2006	145,304	821	8,685	62,735	1%	44%	130	3%
	2007	136,955	459	3,957	62,099	0%	46%	124	3%
	2008	130,650	8,812	8,982	37,433	7%	35%	118	3%
	2009	121,135	0	0	37,267	0%	31%	111	3%
	2010	115,626	52,547	0	18,593	45%	62%	103	6%
	2011	108,967	0	13,100	20,245	0%	19%	97	5%
	2012	103,601	40,084	21,236	18,288	39%	56%	91	7%
	2013	95,850	132,971	52,854	30,997	139%	171%	88	12%
	2014	92,848	72,579	54,224	23,363	78%	103%	84	15%
	2015	85,876	221,457	101,927	-54,003	258%	195%	74	23%
	2016	68,556	170,591	151,098	-55,585	249%	168%	64	28%
Projected Future Experience (50 Years)	2017	60,666	89,029	93,808	-16,123	147%	120%	59	31%
	2018	54,821	89,789	96,547	-21,557	164%	124%	54	33%
	2019	49,220	89,332	97,190	-26,538	181%	128%	50	35%
	2020	43,898	86,552	96,764	-30,340	197%	128%	45	37%
	2021	38,880	82,803	95,862	-33,216	213%	128%	41	39%
	2022	34,184	78,470	93,708	-34,839	230%	128%	36	40%
	2023	29,829	73,824	90,522	-35,655	247%	128%	32	42%
	2024	25,822	69,009	86,841	-35,747	267%	129%	29	43%
	2025	22,167	64,119	82,855	-35,017	289%	131%	25	44%
	2026	18,862	58,789	78,574	-33,333	312%	135%	22	45%
	2027	15,902	52,633	73,735	-30,645	331%	138%	19	46%
	2028	13,279	46,473	68,412	-27,723	350%	141%	16	47%
	2029	10,979	40,447	62,746	-24,756	368%	143%	14	47%
	2030	8,988	34,590	56,858	-21,629	385%	144%	12	48%
	2031	7,291	29,007	50,866	-18,563	398%	143%	10	48%
	2032	5,863	24,046	44,936	-15,751	410%	141%	8	49%
	2033	4,674	19,917	39,262	-13,322	426%	141%	7	49%
	2034	3,696	16,446	33,977	-11,226	445%	141%	6	49%
	2035	2,904	13,608	29,165	-9,468	469%	143%	5	49%
	2036	2,271	11,367	24,884	-8,090	501%	144%	4	49%
	2037	1,768	9,590	21,150	-6,990	542%	147%	4	50%
	2038	1,380	8,188	17,942	-6,115	593%	150%	3	50%
	2039	1,078	7,024	15,212	-5,325	652%	158%	3	50%
	2040	842	6,073	12,909	-4,641	722%	170%	2	50%
	2041	660	5,315	10,983	-4,073	805%	188%	2	50%
	2042	517	4,649	9,377	-3,567	900%	209%	2	50%
	2043	406	4,070	8,034	-3,107	1,003%	237%	1	50%
	2044	318	3,497	6,898	-2,680	1,101%	257%	1	50%
	2045	250	2,967	5,922	-2,267	1,185%	279%	1	50%
	2046	196	2,507	5,081	-1,909	1,277%	305%	1	50%
	2047	154	2,120	4,356	-1,598	1,378%	339%	1	50%
	2048	120	1,792	3,730	-1,336	1,492%	380%	1	50%
	2049	93	1,498	3,188	-1,096	1,609%	432%	0	50%
	2050	72	1,220	2,710	-887	1,686%	460%	0	50%
	2051	56	977	2,288	-717	1,751%	466%	0	50%
	2052	42	776	1,918	-573	1,836%	482%	0	50%
	2053	32	617	1,596	-452	1,929%	515%	0	50%
	2054	24	480	1,316	-352	1,994%	533%	0	50%
	2055	18	364	1,074	-272	2,051%	517%	0	50%
	2056	13	273	866	-208	2,086%	497%	0	50%
	2057-2061	28	596	2,236	-469	2,165%	462%	0	50%
	2062-2066	5	102	559	-80	2,253%	489%	0	50%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	2,921,756	822,959	485,329	532,256	28%	46%
Future	365,140	823,696	1,052,841	-532,298	226%	80%
Lifetime	3,286,896	1,646,656	1,538,170	-42	50%	50%

Attachment F-2-b
MedAmerica and CICA
Actual and Projected Experience by Calendar Year
Virginia-Specific Experience After Requested Rate Increase
515 Series with No Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1999	20,621	0	0	1,979	0%	10%	51	0%
	2000	52,789	0	0	14,360	0%	27%	63	0%
	2001	81,018	2,564	0	31,294	3%	42%	91	2%
	2002	128,551	0	2,631	50,417	0%	39%	137	1%
	2003	150,201	1,767	0	76,340	1%	52%	140	1%
	2004	147,554	19,587	2,265	81,785	13%	69%	135	4%
	2005	146,798	0	9,315	74,651	0%	51%	137	3%
	2006	145,304	821	8,685	62,735	1%	44%	130	3%
	2007	136,955	459	3,957	62,099	0%	46%	124	3%
	2008	130,650	8,812	8,982	37,433	7%	35%	118	3%
	2009	121,135	0	0	37,267	0%	31%	111	3%
	2010	115,626	52,547	0	18,593	45%	62%	103	6%
	2011	108,967	0	13,100	20,245	0%	19%	97	5%
	2012	103,601	40,084	21,236	18,288	39%	56%	91	7%
	2013	95,850	132,971	52,854	30,997	139%	171%	88	12%
	2014	92,848	72,579	54,224	23,363	78%	103%	84	15%
	2015	85,876	221,457	101,927	-54,003	258%	195%	74	23%
	2016	68,556	170,591	151,098	-55,585	249%	168%	64	28%
Projected Future Experience (50 Years)	2017	60,666	89,029	93,808	-16,123	147%	120%	59	31%
	2018	54,821	89,789	96,547	-21,557	164%	124%	54	33%
	2019	49,220	89,332	97,190	-26,538	181%	128%	50	35%
	2020	43,898	86,552	96,764	-30,340	197%	128%	45	37%
	2021	38,880	82,803	95,862	-33,216	213%	128%	41	39%
	2022	34,184	78,470	93,708	-34,839	230%	128%	36	40%
	2023	29,829	73,824	90,522	-35,655	247%	128%	32	42%
	2024	25,822	69,009	86,841	-35,747	267%	129%	29	43%
	2025	22,167	64,119	82,855	-35,017	289%	131%	25	44%
	2026	18,862	58,789	78,574	-33,333	312%	135%	22	45%
	2027	15,902	52,633	73,735	-30,645	331%	138%	19	46%
	2028	13,279	46,473	68,412	-27,723	350%	141%	16	47%
	2029	10,979	40,447	62,746	-24,756	368%	143%	14	47%
	2030	8,988	34,590	56,858	-21,629	385%	144%	12	48%
	2031	7,291	29,007	50,866	-18,563	398%	143%	10	48%
	2032	5,863	24,046	44,936	-15,751	410%	141%	8	49%
	2033	4,674	19,917	39,262	-13,322	426%	141%	7	49%
	2034	3,696	16,446	33,977	-11,226	445%	141%	6	49%
	2035	2,904	13,608	29,165	-9,468	469%	143%	5	49%
	2036	2,271	11,367	24,884	-8,090	501%	144%	4	49%
	2037	1,768	9,590	21,150	-6,990	542%	147%	4	50%
	2038	1,380	8,188	17,942	-6,115	593%	150%	3	50%
	2039	1,078	7,024	15,212	-5,325	652%	158%	3	50%
	2040	842	6,073	12,909	-4,641	722%	170%	2	50%
	2041	660	5,315	10,983	-4,073	805%	188%	2	50%
	2042	517	4,649	9,377	-3,567	900%	209%	2	50%
	2043	406	4,070	8,034	-3,107	1,003%	237%	1	50%
	2044	318	3,497	6,898	-2,680	1,101%	257%	1	50%
	2045	250	2,967	5,922	-2,267	1,185%	279%	1	50%
	2046	196	2,507	5,081	-1,909	1,277%	305%	1	50%
	2047	154	2,120	4,356	-1,598	1,378%	339%	1	50%
	2048	120	1,792	3,730	-1,336	1,492%	380%	1	50%
	2049	93	1,498	3,188	-1,096	1,609%	432%	0	50%
	2050	72	1,220	2,710	-887	1,686%	460%	0	50%
	2051	56	977	2,288	-717	1,751%	466%	0	50%
	2052	42	776	1,918	-573	1,836%	482%	0	50%
	2053	32	617	1,596	-452	1,929%	515%	0	50%
	2054	24	480	1,316	-352	1,994%	533%	0	50%
	2055	18	364	1,074	-272	2,051%	517%	0	50%
	2056	13	273	866	-208	2,086%	497%	0	50%
	2057-2061	28	596	2,236	-469	2,165%	462%	0	50%
	2062-2066	5	102	559	-80	2,253%	489%	0	50%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	2,921,756	822,959	485,329	532,256	28%	46%
Future	365,140	823,696	1,052,841	-532,290	226%	80%
Lifetime	3,286,896	1,646,656	1,538,170	-34	50%	50%

Attachment F-3-a
MedAmerica and CICA
Actual and Projected Experience by Calendar Year
Virginia-Specific Experience Before Requested Rate Increase
515 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1999	16,561	0	0	1,322	0%	8%	41	0%
	2000	62,948	0	0	26,433	0%	42%	62	0%
	2001	94,691	141,810	0	55,956	150%	209%	112	79%
	2002	158,597	0	2,094	101,319	0%	64%	166	43%
	2003	184,163	403	17,422	147,387	0%	80%	167	28%
	2004	184,613	0	35,598	194,934	0%	106%	170	22%
	2005	182,229	441	41,357	189,533	0%	104%	162	18%
	2006	185,486	2,014	39,137	203,430	1%	111%	164	15%
	2007	182,360	0	35,668	233,759	0%	128%	156	13%
	2008	176,748	0	2,052	225,981	0%	128%	150	12%
	2009	170,953	193,978	2,746	213,295	113%	238%	142	21%
	2010	165,646	0	32,629	241,858	0%	146%	138	19%
	2011	161,613	410,290	42,435	245,537	254%	406%	134	35%
	2012	154,551	92,686	90,855	206,957	60%	194%	128	36%
	2013	149,863	28,690	210,036	234,511	19%	176%	123	35%
	2014	142,693	4,703	187,934	210,653	3%	151%	120	34%
	2015	135,158	25,432	135,204	112,814	19%	102%	112	33%
	2016	128,031	377,388	98,298	156,938	295%	417%	107	42%
Projected Future Experience (50 Years)	2017	120,473	143,718	110,650	147,732	119%	242%	102	44%
	2018	113,658	158,676	133,473	128,235	140%	252%	97	47%
	2019	106,876	174,465	151,204	106,150	163%	263%	92	49%
	2020	100,148	189,534	167,351	81,711	189%	271%	87	52%
	2021	93,487	204,542	182,353	55,744	219%	278%	82	55%
	2022	86,917	220,325	196,594	28,779	253%	287%	77	58%
	2023	80,457	236,424	210,725	1,541	294%	296%	72	61%
	2024	74,132	251,984	225,323	-25,181	340%	306%	67	65%
	2025	67,970	267,264	240,548	-51,171	393%	318%	62	68%
	2026	61,994	281,245	256,101	-75,440	454%	332%	57	71%
	2027	56,233	292,111	270,944	-96,920	519%	347%	53	75%
	2028	50,719	298,675	284,251	-114,452	589%	363%	48	78%
	2029	45,478	301,937	295,524	-129,546	664%	379%	44	81%
	2030	40,537	301,349	304,278	-141,400	743%	395%	40	84%
	2031	35,926	297,040	310,115	-148,951	827%	412%	36	87%
	2032	31,660	290,890	313,099	-153,555	919%	434%	32	90%
	2033	27,740	283,930	313,597	-156,879	1,024%	458%	29	93%
	2034	24,165	275,371	311,809	-158,767	1,140%	483%	25	95%
	2035	20,935	264,980	307,781	-157,389	1,266%	514%	22	98%
	2036	18,044	253,140	301,637	-153,856	1,403%	550%	20	100%
	2037	15,479	240,390	293,598	-148,656	1,553%	593%	17	102%
	2038	13,226	228,157	284,107	-143,231	1,725%	642%	15	103%
	2039	11,255	215,874	273,507	-136,873	1,918%	702%	13	105%
	2040	9,546	202,741	261,933	-129,402	2,124%	768%	11	106%
	2041	8,074	190,133	249,684	-122,191	2,355%	841%	10	108%
	2042	6,814	177,003	236,872	-113,753	2,597%	928%	9	109%
	2043	5,740	164,097	223,649	-105,122	2,859%	1027%	7	110%
	2044	4,829	151,379	210,164	-96,082	3,134%	1145%	6	111%
	2045	4,059	139,404	196,636	-87,800	3,434%	1271%	5	111%
	2046	3,411	128,466	183,323	-80,173	3,766%	1416%	5	112%
	2047	2,868	117,309	170,237	-72,882	4,091%	1549%	4	113%
	2048	2,412	106,651	157,442	-65,739	4,422%	1696%	3	113%
	2049	2,030	96,532	145,020	-59,146	4,756%	1842%	3	114%
	2050	1,709	87,700	133,150	-53,265	5,131%	2015%	3	114%
	2051	1,445	80,441	122,065	-48,368	5,567%	2220%	2	114%
	2052	1,223	74,645	111,951	-44,602	6,104%	2457%	2	115%
	2053	1,038	69,378	102,819	-41,012	6,686%	2734%	2	115%
	2054	883	64,972	94,680	-37,875	7,356%	3068%	1	115%
	2055	754	61,306	87,531	-35,480	8,134%	3427%	1	116%
	2056	643	58,366	81,346	-33,854	9,073%	3810%	1	116%
	2057-2061	2,049	249,215	338,007	-152,790	12,163%	4706%	3	117%
	2062-2066	860	152,929	238,065	-109,753	17,790%	5023%	1	117%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,895,059	1,639,978	1,195,543	3,002,615	42%	119%
Future	979,698	4,061,580	4,226,230	-2,994,630	415%	109%
Lifetime	4,874,757	5,701,558	5,421,773	7,985	117%	117%

Attachment F-3-b
MedAmerica and CICA
Actual and Projected Experience by Calendar Year
Virginia-Specific Experience After Requested Rate Increase
515 Series with Inflation Protection

		Actual or Projected Experience using Current Assumptions							Cumulative LR with Interest
		A	B	C	D	E = B / A	F = (B + D) / A	G	H
	Calendar Year	Earned Premium	Incurred Claims	Paid Claims	Change in Active Life Reserves	Incurred Loss Ratio	Loss Ratio with Chg in ALR	End of Year Lives	Actual (Column E) with Max. Val. Interest
Historical Experience	1999	16,561	0	0	1,322	0%	8%	41	0%
	2000	62,948	0	0	26,433	0%	42%	62	0%
	2001	94,691	141,810	0	55,956	150%	209%	112	79%
	2002	158,597	0	2,094	101,319	0%	64%	166	43%
	2003	184,163	403	17,422	147,387	0%	80%	167	28%
	2004	184,613	0	35,598	194,934	0%	106%	170	22%
	2005	182,229	441	41,357	189,533	0%	104%	162	18%
	2006	185,486	2,014	39,137	203,430	1%	111%	164	15%
	2007	182,360	0	35,668	233,759	0%	128%	156	13%
	2008	176,748	0	2,052	225,981	0%	128%	150	12%
	2009	170,953	193,978	2,746	213,295	113%	238%	142	21%
	2010	165,646	0	32,629	241,858	0%	146%	138	19%
	2011	161,613	410,290	42,435	245,537	254%	406%	134	35%
	2012	154,551	92,686	90,855	206,957	60%	194%	128	36%
	2013	149,863	28,690	210,036	234,511	19%	176%	123	35%
	2014	142,693	4,703	187,934	210,653	3%	151%	120	34%
	2015	135,158	25,432	135,204	112,814	19%	102%	112	33%
	2016	128,031	377,388	98,298	156,938	295%	417%	107	42%
Projected Future Experience (50 Years)	2017	120,473	143,718	110,650	147,732	119%	242%	102	44%
	2018	131,934	154,977	132,741	-226,030	117%	-54%	91	47%
	2019	191,721	156,373	146,828	-165,024	82%	-5%	83	48%
	2020	187,778	167,697	158,521	66,613	89%	125%	78	49%
	2021	175,289	180,563	169,423	45,444	103%	129%	74	51%
	2022	162,969	194,068	179,916	23,462	119%	133%	69	53%
	2023	150,857	207,807	190,556	1,256	138%	139%	65	55%
	2024	138,998	221,036	201,864	-20,528	159%	144%	60	57%
	2025	127,444	233,996	213,992	-41,716	184%	151%	56	59%
	2026	116,239	245,801	226,640	-61,500	211%	159%	52	61%
	2027	105,437	254,872	238,800	-79,011	242%	167%	47	64%
	2028	95,098	260,185	249,709	-93,304	274%	175%	43	66%
	2029	85,271	262,623	258,902	-105,609	308%	184%	39	68%
	2030	76,008	261,726	265,952	-115,272	344%	193%	36	71%
	2031	67,361	257,627	270,508	-121,428	382%	202%	32	73%
	2032	59,362	251,962	272,626	-125,180	424%	214%	29	75%
	2033	52,013	245,625	272,624	-127,890	472%	226%	26	76%
	2034	45,310	237,938	270,675	-129,430	525%	239%	23	78%
	2035	39,253	228,702	266,821	-128,306	583%	256%	20	80%
	2036	33,833	218,255	261,171	-125,426	645%	274%	18	81%
	2037	29,024	207,064	253,918	-121,187	713%	296%	16	83%
	2038	24,798	196,355	245,446	-116,764	792%	321%	14	84%
	2039	21,103	185,633	236,052	-111,581	880%	351%	12	85%
	2040	17,899	174,209	225,851	-105,491	973%	384%	10	86%
	2041	15,140	163,263	215,102	-99,612	1,078%	420%	9	87%
	2042	12,777	151,895	203,898	-92,734	1,189%	463%	8	88%
	2043	10,762	140,739	192,370	-85,697	1,308%	511%	7	89%
	2044	9,055	129,764	180,645	-78,327	1,433%	568%	6	89%
	2045	7,611	119,442	168,908	-71,576	1,569%	629%	5	90%
	2046	6,396	110,024	157,378	-65,358	1,720%	698%	4	90%
	2047	5,377	100,431	146,064	-59,415	1,868%	763%	4	91%
	2048	4,522	91,274	135,017	-53,591	2,018%	833%	3	91%
	2049	3,805	82,587	124,307	-48,217	2,170%	903%	3	92%
	2050	3,205	75,007	114,083	-43,423	2,340%	986%	2	92%
	2051	2,709	68,780	104,544	-39,431	2,539%	1083%	2	92%
	2052	2,293	63,810	95,846	-36,360	2,783%	1197%	2	92%
	2053	1,946	59,294	87,997	-33,434	3,048%	1329%	1	93%
	2054	1,656	55,518	81,006	-30,876	3,352%	1488%	1	93%
	2055	1,413	52,375	74,867	-28,924	3,706%	1659%	1	93%
	2056	1,206	49,854	69,558	-27,598	4,133%	1845%	1	93%
	2057-2061	3,842	212,786	288,832	-124,557	5,539%	2296%	3	94%
	2062-2066	1,612	130,502	203,265	-89,473	8,097%	2546%	1	94%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,895,059	1,639,978	1,195,543	3,002,615	42%	119%
Future	1,649,976	3,568,616	3,755,097	-2,996,105	216%	35%
Lifetime	5,545,035	5,208,593	4,950,640	6,510	94%	94%

Attachment G-1
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica and CICA Virginia-Specific Experience
515 Series

1	Accumulated value of current earned premium	6,816,815	x	68%	=	4,661,110
2	Present value of future projected current earned premium	1,203,386	x	68%	=	822,835
3a	Present value of future projected premium	2,015,116				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	811,730	x	80%	=	649,384
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**6,133,329**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					2,462,937
5b	Present value of future projected incurred claims without the inclusion of active life reserves					4,392,312
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**6,855,249**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment G-2
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica and CICA Virginia-Specific Experience
515 Series with No Inflation Protection

1	Accumulated value of current earned premium	2,921,756	x	64%	=	1,873,702
2	Present value of future projected current earned premium	365,140	x	64%	=	234,162
3a	Present value of future projected premium	365,140				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	0	x	80%	=	0
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**2,107,864**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					822,959
5b	Present value of future projected incurred claims without the inclusion of active life reserves					823,696
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**1,646,656**
7	Test: 6 is not less than 4					Fail

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment G-3
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica and CICA Virginia-Specific Experience
515 Series with Inflation Protection

1	Accumulated value of current earned premium	3,895,059	x	71%	=	2,767,482
2	Present value of future projected current earned premium	838,149	x	71%	=	595,514
3a	Present value of future projected premium	1,649,976				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	811,828	x	80%	=	649,462
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**4,012,458**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					1,639,978
5b	Present value of future projected incurred claims without the inclusion of active life reserves					3,568,616
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**5,208,593**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment H-1
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica and CICA Virginia-Specific Experience
515 Series Issued Prior to October 1, 2003

1	Accumulated value of current earned premium	6,318,905	x	69%	=	4,341,868
2	Present value of future projected current earned premium	993,239	x	69%	=	682,478
3a	Present value of future projected premium	1,609,540				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	616,301	x	80%	=	493,041
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**5,517,386**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					2,345,536
5b	Present value of future projected incurred claims without the inclusion of active life reserves					3,742,488
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**6,088,024**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which is 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment H-2
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica and CICA Virginia-Specific Experience
515 Series with No Inflation Protection Issued Prior to October 1, 2003

1	Accumulated value of current earned premium	2,845,105	x	65%	=	1,836,452
2	Present value of future projected current earned premium	346,030	x	65%	=	223,355
3a	Present value of future projected premium	346,030				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	0	x	80%	=	0
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**2,059,806**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					822,243
5b	Present value of future projected incurred claims without the inclusion of active life reserves					799,754
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**1,621,997**
7	Test: 6 is not less than 4					Fail

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which is 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment H-3
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement
MedAmerica and CICA Virginia-Specific Experience
515 Series with Inflation Protection Issued Prior to October 1, 2003

1	Accumulated value of current earned premium	3,473,800	x	72%	=	2,487,098
2	Present value of future projected current earned premium	647,209	x	72%	=	463,375
3a	Present value of future projected premium	1,263,510				
3b	Present value of future projected premium in excess of the projected current earned premiums (3a - 2)	616,301	x	80%	=	493,041
4	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2, and 3b**					**3,443,514**
5a	Accumulated value of incurred claims without the inclusion of active life reserves					1,523,292
5b	Present value of future projected incurred claims without the inclusion of active life reserves					2,942,734
6	**Lifetime Incurred Claims with Rate Increase: Sum 5a and 5b**					**4,466,027**
7	Test: 6 is not less than 4					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which is 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Current earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment I-1
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica and CICA Virginia-Specific Experience
515 Series

1	Accumulated value of initial earned premium	6,816,815	x	58%	=	3,953,753
2a	Accumulated value of earned premium	6,816,815				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	1,203,386	x	58%	=	697,964
4a	Present value of future projected premium	2,015,116				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	811,730	x	85%	=	689,970
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**5,341,687**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					2,462,937
6b	Present value of future projected incurred claims without the inclusion of active life reserves					5,051,159
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**7,514,096**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment I-2
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica and CICA Virginia-Specific Experience
515 Series with No Inflation Protection

1	Accumulated value of initial earned premium	2,921,756	x	58%	=	1,694,619
2a	Accumulated value of earned premium	2,921,756				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	365,140	x	58%	=	211,781
4a	Present value of future projected premium	365,140				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	0	x	85%	=	0
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**1,906,400**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					822,959
6b	Present value of future projected incurred claims without the inclusion of active life reserves					947,251
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**1,770,210**
8	Test: 7 is not less than 5					Fail

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment I-3
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica and CICA Virginia-Specific Experience
515 Series with Inflation Protection

1	Accumulated value of initial earned premium	3,895,059	x	58%	=	2,259,134
2a	Accumulated value of earned premium	3,895,059				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	838,149	x	58%	=	486,126
4a	Present value of future projected premium	1,649,976				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	811,828	x	85%	=	690,053
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**3,435,314**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					1,639,978
6b	Present value of future projected incurred claims without the inclusion of active life reserves					4,103,908
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**5,743,886**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment J-1
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica and CICA Virginia-Specific Experience
515 Series Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	497,910	x	58%	=	288,788
2a	Accumulated value of earned premium	497,910				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	210,060	x	58%	=	121,835
4a	Present value of future projected premium	405,576				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	195,516	x	85%	=	166,188
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**576,811**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					117,401
6b	Present value of future projected incurred claims without the inclusion of active life reserves					747,297
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**864,699**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment J-2
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica and CICA Virginia-Specific Experience
515 Series with No Inflation Protection Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	76,651	x	58%	=	44,458
2a	Accumulated value of earned premium	76,651				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	19,110	x	58%	=	11,084
4a	Present value of future projected premium	19,110				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	0	x	85%	=	0
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**55,541**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					716
6b	Present value of future projected incurred claims without the inclusion of active life reserves					27,534
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**28,250**
8	Test: 7 is not less than 5					Fail

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment J-3
Demonstration that the Requested Cumulative Rate Increase Passes the 58%/85% Loss Ratio Minimum
MedAmerica and CICA Virginia-Specific Experience
515 Series with Inflation Protection Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	421,258	x	58%	=	244,330
2a	Accumulated value of earned premium	421,258				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	190,938	x	58%	=	110,744
4a	Present value of future projected premium	386,466				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	195,528	x	85%	=	166,198
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**521,273**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					116,686
6b	Present value of future projected incurred claims without the inclusion of active life reserves					719,764
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**836,449**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

MEDAmerica
An Excellus Company

MedAmerica Insurance Company
Home Office: Pittsburgh, PA

MedAmerica Insurance Company of New York
Home Office: Rochester, NY

MedAmerica Insurance Company of Florida
Home Office: Orlando, FL

September 7, 2018

Mr. Bill Dismore
Virginia Bureau of Insurance (Bureau)

Via SERFF

RE: MedAmerica Insurance Company (MedAmerica)
Company NAIC #69515
SERFF Tracking #MILL-131333141

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Mr. Dismore:

Thank you for reviewing this filing. This letter is in response to your letter dated September 4, 2018 regarding the above-referenced filing. The Bureau's requests are restated in italics below, followed by my responses.

1. *Please provide a description of the originally filed expense assumptions referred to in section 5. h.*

The originally filed expense assumptions for the policy form are shown in Attachment I, an extract from the original actuarial memorandum filed on behalf of CICA (Combined Insurance Company of America).

2. *Provide an explanation as to why active life reserves and reserves for the election of a CBUL have not been used in the experience exhibits for this rate increase analysis as stated in section 12. Reserves. As required by 14VAC5-200-153 B 3 b. disclose how reserves have been incorporated in this rate increase since it will trigger the contingent benefit upon lapse.*

Section 12 of the Actuarial Memorandum describes the experience exhibits included with the Memorandum (Exhibits I-a and I-b). These experience exhibits show projections of earned premium and incurred claims in accordance with 14VAC5-200-153 B 3 a. Active life reserves do not enter into the usual calculation of lifetime loss ratio. Exhibits attached to and described in the August 30, 2018 Supplement and the August 30, 2018 response letter to your previous Note to Filer do include changes in active life reserves; over the lifetime of the policy form the effect of active life reserve changes on the loss ratio will net to zero.

CBUL elections are modeled as lapses (i.e. no reserve for future claims) as described in Section 5.e of the Actuarial Memorandum. This modeling simplification results in a slightly lower lifetime loss ratio and therefore a slightly lower rate increase required.

3. *Provide an exhibit that shows the rate revision status in each state in which these policy forms have active policyholders.*

Attachment II provides the requested exhibit showing rate revision status by state.

Thank you for working with us to complete this filing in Virginia. Please let me know if you have any additional questions. You can reach me directly at (585) 238-4379 or by e-mail at: patrick.kinney@medamericaltc.com.

Respectfully,

J. Patrick Kinney III, FSA, MAAA
Managing Actuary, LTC Pricing
MedAmerica Insurance Company
165 Court Street, Rochester NY 14647
(585) 238-4379

Attachment I: Original Pricing Expense Assumptions
Attachment II: Rate revision status by state

8	9	8	8	7	6	6	5
9	9	8	7	7	5	5	4
10	9	8	7	6	5	5	4
11	8	8	7	6	4	4	4
12	8	7	6	6	4	4	4
13	8	7	6	5	4	4	4
14	7	7	6	5	4	4	4
15	7	6	6	5	4	4	4
16	6	6	6	4	4	4	4
17	6	6	5	4	4	4	4
18	5	5	5	4	4	4	4
19	5	5	5	4	4	4	4
20+	4	4	4	4	4	4	4

Based on recent mortality experience from the Society of Actuaries LTC Experience Committee, we developed a mortality assumption (involuntary lapse rate) based on U.S. Life Mortality (79-81). It assumes ultimate mortality of 95% of U.S. Life Mortality (79-81), with selection factors at the early durations.

C. Expenses

Type of Expense	Cost	Unit
Underwriting/Protective Info	Varies by age Average = 20.3%	Of First Year Premium*
Administrative	13%	Of Each Year's Premium
Premium Taxes	2%	Of Each Year's Premium

* The total underwriting and reject rates were assumed to be: 16% for ages <66, 17% for ages 66-71, 20% for ages 72-74, 30% for ages 75-79, and 35% for ages 80+.

D. Commissions

For policies to be sold by the company's agency force, commissions and overrides were varied by policy year, producing an average cost of 13.6% of premium over the policy's lifetime.

Commissions were assumed to be paid on original premium at issue and not on waived premiums.

For policies sold by estate-planning consultants, no commissions were assumed. These consultants will be compensated on a fee-for-service basis, as part of their general services to the insured. Thus, a separate set of premiums has been developed for these sales, so that the commission savings can be passed on to the insured.

E. Distributions

The following issue age distribution of insureds was assumed:

Issue Age	Distribution
42	.1%
47	.5
52	1.1
57	4.1
62	17.0
67	29.3
72	23.2
77	18.3
82	6.4

Attachment II
MedAmerica, CICA, and CLICNY
Status of Filings as of September 6, 2018
All Jurisdictions in Which These Forms are In Force
515, 700, and 780 Series with Inflation Protection

					2013 Rate Increase Filings			2015 Rate Increase Filings			Current Requested Increases					Average
Jurisdiction	Rate Series	12/31/2016 Policies In Force	12/31/2016 Annualized Premium	Percent of Total Premium	Requested Increase	Disposition Date	Average Filed Increase[1]	Requested Increase	Disposition Date	Average Filed Increase[1]	Requested Increase	Status[1][2]	Date Submitted	Disposition Date	Average Filed Increase[1]	Cumulative Increase Filed[1]
Arkansas	515 Series	56	$75,370	1.6%	38%	Disapproved	0%	38%	6/19/2015	18%	96%	Filed	6/8/2018	6/18/2018	15%	35%
Arkansas	780 Series	2	$2,877	0.1%	N/A			N/A			35%	Filed	6/8/2018	6/18/2018	15%	15%
Arizona	515 Series	4	$4,186	0.1%	Not Filed			Not Filed				Not Filing				0%
Arizona	780 Series	1	$1,756	0.0%	N/A			N/A				Not Filing				0%
California	515 Series	84	$114,300	2.4%	Not Filed			Not Filed				Not Filing				0%
California	780 Series	23	$36,612	0.8%	N/A			N/A				Not Filing				0%
Colorado	515 Series	82	$150,928	3.1%	Not Filed			38%	3/30/2015	13%	104%	Not Yet Filed				13%
Colorado	700 Series	1	$942	0.0%	N/A			N/A			100%	Not Yet Filed				0%
Connecticut	515 Series	31	$46,965	1.0%	38%	Disapproved	0%	Not Filed			130%	Filed	4/25/2018	5/23/2018	15%	15%
Delaware	515 Series	4	$7,462	0.2%	38%	4/2/2014	38%	Not Filed				Not Filing				38%
Florida	700 Series	21	$38,633	0.8%	N/A			N/A			43%	Filed	3/2/2017	10/3/2017	41%	41%
Florida	780 Series	5	$8,478	0.2%	N/A			N/A			43%	Filed	3/2/2017	10/3/2017	41%	41%
Georgia	515 Series	64	$108,605	2.3%	38%	8/22/2014	15%	20%	7/28/2015	8%	85%	Filed	2/6/2018	5/29/2018	12%	39%
Iowa	515 Series	54	$80,819	1.7%	38%	4/4/2014	17%	18%	9/10/2015	18%		TBD				38%
Iowa	780 Series	47	$77,755	1.6%	N/A			N/A				TBD				0%
Idaho	515 Series	101	$121,512	2.5%	38%	11/12/2014	20%	15%	Disapproved	0%	92%	Pending	2/2/2018			20%
Idaho	780 Series	20	$23,224	0.5%	N/A			N/A			35%	Pending	2/2/2018			0%
Illinois	515 Series	146	$206,989	4.3%	38%	8/15/2014	38%	Not Filed			67%	Pending	12/21/2017			38%
Illinois	700 Series	2	$3,258	0.1%	N/A			N/A			100%	Pending	12/21/2017			0%
Illinois	780 Series	54	$69,031	1.4%	N/A			N/A			35%	Pending	12/21/2017			0%
Indiana	515 Series	56	$95,264	2.0%	Not Filed			38%	8/7/2015	10%	110%	Not Yet Filed				10%
Indiana	700 Series	26	$46,395	1.0%	N/A			N/A			100%	Not Yet Filed				0%
Kansas	515 Series	5	$5,838	0.1%	38%	6/6/2014	38%	Not Filed				Not Filing				38%
Kentucky	515 Series	14	$18,737	0.4%	38%	4/7/2014	23%	22%	4/18/2016	50%		TBD				84%
Kentucky	780 Series	6	$5,192	0.1%	N/A			N/A				TBD				0%
Louisiana	515 Series	20	$24,562	0.5%	38%	11/13/2014	20%	15%	Disapproved	0%	92%	Disapproved	7/9/2018	7/30/2018	0%	20%
Louisiana	780 Series	17	$28,204	0.6%	N/A			N/A			35%	Disapproved	7/9/2018	7/30/2018	0%	0%
Massachusetts	515 Series	14	$14,521	0.3%	Not Filed			Not Filed			40%	Pending	8/4/2017			0%
Maryland	780 Series	6	$12,299	0.3%	N/A			N/A				Not Filing				0%
Maine	515 Series	10	$21,819	0.5%	38%	2/27/2015	22%	Not Filed			89%	Pending	8/10/2018			22%
Maine	700 Series	23	$23,102	0.5%	N/A			N/A			100%	Pending	8/10/2018			0%
Maine	780 Series	12	$15,914	0.3%	N/A			N/A			35%	Pending	8/10/2018			0%
Michigan	515 Series	23	$39,343	0.8%	38%	2/3/2014	38%	Not Filed			67%	Filed	1/26/2018	2/27/2018	67%	130%
Michigan	700 Series	67	$91,196	1.9%	N/A			N/A			100%	Filed	1/26/2018	2/27/2018	100%	100%
Minnesota	515 Series	236	$404,836	8.4%	Not Filed			38%	2/5/2016	44%		TBD				44%
Minnesota	780 Series	177	$259,748	5.4%	N/A			N/A			35%	Not Yet Filed				0%
Missouri	515 Series	142	$230,092	4.8%	38%	3/25/2014	20%	15%	5/4/2015	15%	92%	Filed	3/13/2018	5/29/2018	38%	91%
Missouri	780 Series	13	$19,777	0.4%	N/A			N/A			35%	Filed	3/13/2018	5/25/2018	20%	20%
Mississippi	515 Series	3	$2,655	0.1%	Not Filed			Not Filed				Not Filing				0%
Montana	515 Series	38	$51,183	1.1%	38%	7/3/2014	15%	20%	Withdrawn			TBD				15%
Montana	780 Series	1	$2,009	0.0%	N/A			N/A				TBD				0%

[1] "Filed" is used in a generic sense to indicate that a rate increase has been approved, accepted, filed for use, etc., by a jurisdiction. Average rate increase percentages are based off the business in force as of December 31, 2016 for policies with inflation protection.

[2] The company is "Not Filing" in jurisdictions in which it is not practical due to limited amount of in-force business or regulatory requirements.

Attachment II
MedAmerica, CICA, and CLICNY
Status of Filings as of September 6, 2018
All Jurisdictions in Which These Forms are In Force
515, 700, and 780 Series with Inflation Protection

					2013 Rate Increase Filings			2015 Rate Increase Filings			Current Requested Increases					Average
Jurisdiction	Rate Series	12/31/2016 Policies In Force	12/31/2016 Annualized Premium	Percent of Total Premium	Requested Increase	Disposition Date	Average Filed Increase[1]	Requested Increase	Disposition Date	Average Filed Increase[1]	Requested Increase	Status[1][2]	Date Submitted	Disposition Date	Average Filed Increase[1]	Cumulative Increase Filed[1]
North Carolina	515 Series	113	$153,678	3.2%	38%	9/26/2014	20%	Not Filed			140%	Pending	3/13/2018			20%
North Carolina	780 Series	24	$35,520	0.7%	N/A			N/A			42%	Pending	3/13/2018			0%
North Dakota	780 Series	1	$1,152	0.0%	N/A			N/A				Not Filing				0%
Nebraska	515 Series	13	$18,691	0.4%	38%	8/11/2014	38%	Not Filed			67%	Not Yet Filed				38%
Nebraska	700 Series	9	$14,846	0.3%	N/A			N/A			100%	Not Yet Filed				0%
New Hampshire	515 Series	15	$22,867	0.5%	38%	3/23/2015	33%	Not Filed			73%	Not Yet Filed				33%
New Hampshire	700 Series	6	$6,302	0.1%	N/A			N/A			100%	Not Yet Filed				0%
New Hampshire	780 Series	8	$9,929	0.2%	N/A			N/A			35%	Not Yet Filed				0%
Nevada	515 Series	7	$9,591	0.2%	38%	10/15/2014	38%	Not Filed				Not Filing				38%
New York	515 Series	54	$96,237	2.0%	Not Filed			15%	7/20/2015	15%	100%	Pending	4/12/2018			15%
Ohio	515 Series	23	$36,258	0.8%	38%	4/24/2015	25%	Not Filed			84%	Pending	6/15/2018			25%
Ohio	700 Series	4	$4,966	0.1%	N/A			N/A			100%	Pending	6/15/2018			0%
Ohio	780 Series	11	$19,649	0.4%	N/A			N/A			35%	Pending	6/15/2018			0%
Oklahoma	515 Series	19	$40,057	0.8%	38%	6/4/2014	25%	10%	1/25/2016	10%		TBD				38%
Oklahoma	780 Series	4	$5,147	0.1%	N/A			N/A				TBD				0%
Oregon	515 Series	122	$205,472	4.3%	38%	5/13/2014	38%	Not Filed				TBD				38%
Oregon	780 Series	26	$50,510	1.0%	N/A			N/A				TBD				0%
Pennsylvania	515 Series	110	$153,272	3.2%	38%	5/13/2014	15%	20%	6/24/2015	20%		TBD				38%
Pennsylvania	780 Series	24	$36,122	0.7%	N/A			N/A				TBD				0%
Rhode Island	515 Series	7	$10,497	0.2%	38%			Not Filed				TBD				0%
South Carolina	515 Series	49	$62,252	1.3%	38%	3/17/2014	20%	Not Filed			92%	Pending	6/1/2018			20%
South Carolina	780 Series	1	$5,672	0.1%	N/A			N/A			35%	Pending	6/1/2018			0%
South Dakota	515 Series	17	$28,582	0.6%	38%	1/6/2014	38%	Not Filed				TBD				38%
South Dakota	780 Series	3	$3,222	0.1%	N/A			N/A				TBD				0%
Tennessee	515 Series	80	$136,655	2.8%	38%	3/24/2014	38%	Not Filed				TBD				38%
Tennessee	780 Series	2	$3,315	0.1%	N/A			N/A				TBD				0%
Texas	515 Series	105	$149,872	3.1%	38%	9/10/2014	19%	Not Filed			93%	Pending	8/13/2018			19%
Texas	780 Series	33	$48,756	1.0%	N/A			N/A			35%	Pending	8/13/2018			0%
Utah	780 Series	2	$2,924	0.1%	N/A			N/A				Not Filing				0%
Virginia	515 Series	107	$123,913	2.6%	Not Filed			38%	Disapproved	0%	130%	Pending	5/2/2018			0%
Vermont	515 Series	82	$98,837	2.0%	38%	Disapproved	0%	38%	Disapproved	0%	130%	Pending	2/9/2018			0%
Vermont	700 Series	25	$30,936	0.6%	N/A			N/A			100%	Pending	2/9/2018			0%
Vermont	780 Series	2	$2,227	0.0%	N/A			N/A			35%	Pending	2/9/2018			0%
Washington	515 Series	172	$318,351	6.6%	38%	4/15/2014	38%	Not Filed			67%	Pending	6/13/2018			38%
Wisconsin	515 Series	106	$129,354	2.7%	38%	3/6/2014	27%	Not Filed			81%	Not Yet Filed				27%
Wisconsin	780 Series	1	$864	0.0%	N/A			N/A				TBD				0%
West Virginia	515 Series	14	$30,198	0.6%	38%	8/6/2014	15%	20%	8/5/2015	20%	67%	Pending	7/9/2018			38%
Wyoming	515 Series	66	$96,214	2.0%	Not Filed			38%	5/19/2015	38%	67%	Filed	2/27/2018	4/17/2018	67%	130%
Wyoming	780 Series	19	$30,442	0.6%	N/A			N/A			35%	Filed	2/27/2018	4/17/2018	35%	35%

[1] "Filed" is used in a generic sense to indicate that a rate increase has been approved, accepted, filed for use, etc., by a jurisdiction. Average rate increase percentages are based off the business in force as of December 31, 2016 for policies with inflation protection.

[2] The company is "Not Filing" in jurisdictions in which it is not practical due to limited amount of in-force business or regulatory requirements.

MEDAmerica
An Excellus Company

MedAmerica Insurance Company
Home Office: Pittsburgh, PA

MedAmerica Insurance Company of New York
Home Office: Rochester, NY

MedAmerica Insurance Company of Florida
Home Office: Orlando, FL

September 21, 2018

Mr. Bill Dismore
Virginia Bureau of Insurance (Bureau)

Via SERFF

RE: MedAmerica Insurance Company (MedAmerica)
Company NAIC #69515
SERFF Tracking #MILL-131333141

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Mr. Dismore:

Thank you for reviewing this filing. This letter is in response to your letter dated September 10, 2018 regarding the above-referenced filing. The Bureau's requests are restated in italics below, followed by my responses.

Objection 1
- L&H Actuarial Memorandum (Supporting Document)

Please confirm if the Company provided the experience and supporting documentation only for form 14515-VA, 14531, 14532, 14533 and not for other companies or forms that were not filed and approved in Virginia, and to which the proposed rate increase does not apply in Virginia if approved. In Virginia, it is not considered appropriate to justify a rate increase by combining the experience of other forms issued by the company, affiliated companies or blocks of business that the company administers or manages. If the experience includes other forms not approved in VA, please provide revised experience exhibits only for VA approved forms.

The experience provided in Milliman's August 30 response letter is for the 515 Series forms listed above only.

Objection 2
- Notice of Premium Increase, CMRIL-VA-0318 (Form)

1) *Will the policyholder receive a revised schedule page if an option is elected? If so, please provide a copy of the form and the date approved, including the SERFF or State tracking number if available.*

Yes. When a policyholder elects the Contingent Non-Forfeiture Benefit, or elects another benefit reduction option available under the policy, they will receive a revised Summary of Benefits page to become part of the policy. This Summary of Benefits Amendment was approved on October 19, 2017 under SERFF #MEAM-131057979. A copy of the form is provided along with this letter.

2) *Pursuant to 14VAC5-200-75 A 4 b, please include a statement in the form regarding the policyholder's right to a revised premium rate or rate schedule if the premium rate or rate schedule is changed.*

The Summary of Benefits provides a policyholder's revised premium rate.

3) *Pursuant to 14VAC5-200-75 D 2 C, the form is required to include a disclosure that some benefit reduction options may result in a loss in partnership status that may reduce policyholder protections, if applicable. Please advise if applicable; if so, please revise the policyholder notification letter accordingly.*

These policy forms were not eligible for Partnership status, so the requirement is not applicable.

4) *Pursuant to 14VAC 5-100-40 A 3, please include a certification similar to the following for the policyholder notification letter, or any other filed form if applicable.*
A statement identical to the following which is signed by the General Counsel or an officer of the company or any attorney or actuary representing the company: The company has reviewed the enclosed policy form(s) and certifies that, to the best of its knowledge and belief, each form submitted is consistent and complies with the requirements of Title 38.2 of the Code of Virginia and the regulations promulgated pursuant thereto.

A Certificate of Compliance, signed by the Company President, is included under the "Certification of Compliance" item on the Supporting Documentation tab of SERFF.

5) *Prior to resubmitting, the company may wish to review the requirements of 14VAC5-200-75 D and 14VAC5-100 et seq. to ensure that all applicable requirements have been met.*

The company has reviewed the requirements of the cited regulations and believes it has met all applicable requirements.

Thank you for working with us to complete this filing in Virginia. Please let me know if you have any additional questions. You can reach me directly at (585) 238-4379 or by e-mail at: patrick.kinney@medamericaltc.com.

Respectfully,

J. Patrick Kinney III, FSA, MAAA
Managing Actuary, LTC Pricing
MedAmerica Insurance Company
165 Court Street, Rochester NY 14647
(585) 238-4379

MEDAmerica
INSURANCE COMPANY
[An Excellus Company Home Office: Pittsburgh, PA]

[DATE]

[INSURED NAME] Re: ACCOUNT#: [XX]
[INSURED ADDRESS – LINE 1]
[INSURED ADDRESS – LINE 2]
[INSURED ADDRESS – CITY, STATE, ZIP]

AMENDMENT
SUMMARY OF BENEFITS

PRODUCT NAME: [XX]
FORM ID #: [XX]
ORIGINAL EFFECTIVE DATE: [XX]
EFFECTIVE DATE OF CHANGE: [XX]
ISSUE AGE: [XX]
DATE OF BIRTH: [Month Day, Year]
PREMIUM PAYMENT TERM: [XX]
BENEFITS SELECTED: **ORIGINAL / CURRENT**

[NURSING HOME DAILY BENEFIT AMOUNT/FACILITY MAXIMUM MONTHLY BENFIT]

[HOME CARE DAILY BENEFIT AMOUNT/COMMUNITY MAXIMUM MONTHLY BENFIT]

[BENEFIT DURATION]: [XX]

[WAITING/ELIMINATION PERIOD]**:** [XX]

[INFLATION PROTECTION]: [XX]

[BILLING FREQUENCY]: [XX]

[CYCLE RATE]: [XX]

[RIDERS SELECTED]: [XX]

This Amendment is a part of Your Policy and is subject to all of its terms and conditions.

MedAmerica Claim Administration and Processing Documentation

As the majority of policies to which this rate increase is applicable are eligible for a contingent benefit upon lapse, the following provides a demonstration that MedAmerica Insurance Company (MedAmerica) has consistently applied appropriate policy administration and claim processing procedures. These procedures are in place to assure that policyholders' long-term care claims are paid according to the provisions of our contracts.

Personal Care Advisors (PCAs) in our Claims Intake area determine whether a claimant qualifies for initial benefit eligibility, and create a plan of care for each eligible claimant. Our Rehabilitation/Case Management team then assigns a PCA to handle all aspects of the insured's contact with the Company, including care planning, ongoing care management, and supervision of claim payment.

While the PCAs are knowledgeable about all of the long term care products administered by the Company, each one specializes in a handful of products to increase claim payment accuracy. For chronically stable patients for whom rehabilitation is unlikely and site of care changes occur infrequently, specialized PCAs are assigned whose primary task is timely adjudication of claims and annual reassessment of benefit eligibility.

All claimants are reassessed at least once per year; claimants in Assisted Living or Home Care status are reassessed more frequently. All claims are reviewed prior to payment. Monthly claims audit procedures are in place. Anti-fraud activities are carried out by the staff of the Special Investigations Unit within our parent company.

MedAmerica management believes that these claims management practices are designed to pay claims correctly and help eliminate the potential for further deterioration of the policy form requiring further premium rate schedule increases.

8500 Normandale Lake Blvd.
Suite 1850
Minneapolis, MN 55437-3830
USA

Tel +1 952 897 5300
Fax +1 952 897 5301

milliman.com

November 12, 2018

Bill Dismore
Virginia Bureau of Insurance (Bureau)

Via SERFF

Re: MedAmerica Insurance Company (MedAmerica)
Company NAIC # 69515
SERFF Tracking # MILL-131333141
515 Series

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Mr. Dismore:

Thank you for reviewing this filing. This letter is in response to your letter dated October 9, 2018 regarding information needed for the above-referenced filing. The remainder of this letter provides the additional information requested in your October 9 letter. The requests are restated in italics for reference.

1. *Please provide the weighted average valuation interest rate separately for pre- and post-stability.*

   The table below provides the weighted average valuation interest rate for policies with inflation protection for both policies issued prior to October 1, 2003 (pre-stability) and policies issued on or after October 1, 2003 (post-stability). The average valuation interest rates were determined by targeting the same interest-adjusted lifetime loss ratio as that calculated using the actual valuation interest rate specific to the policy issue date on a seriatim basis under current most-likely (no explicit margin) assumptions.

Weighted Average Valuation Interest Rate

Pre-Stability	Post-Stability
4.50%	4.20%

   These averages are applicable to Attachments 9 and 11 for inflation policies in response to items 7 and 8. The averages for other attachments may deviate due to differences in weights for other cohorts and projection assumptions.

2. *Please provide the historical claim count for this particular block.*

   There have been 17 and 304 historical claims for policies with inflation protection on the above listed policy form in Virginia and nationwide, respectively.

This work product was prepared solely to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

3. *For all projections requested in the next question, the baseline should comply with the following:*
   a. *All projections should be provided in Excel format.*
   b. *Limited-pay policies in paid-up status should be removed, both from historical experience and future projections.*
   c. *For the pre-stability block, assumptions should use a best-estimate basis; for post-stability, appropriate margins for moderately adverse conditions are allowed.*
   d. *Premiums should be at the Virginia rate level for both historical and projected future.*
   e. *Please use the average maximum valuation interest rate corresponding to the pre-stability and post-stability blocks.*

   The historical and projected experience requested below in item 4 has been provided as requested. These projections are also provided in the enclosed Excel workbook, as requested.

   All experience provided is for policies with a lifetime premium payment option as there are no policies with a limited payment option in this block. Additionally, the experience provided reflects experience limited to the policy and rider forms applicable in Virginia (i.e., 515 Series only) and does not include other forms as requested in the July 20 note to filer. Nationwide experience has been restated to the actual rate increase level approved in Virginia, which reflects no prior rate increases.

   For projections using current assumptions, discounting and accumulation uses the maximum valuation interest rate for contract reserves applicable to the year of issue on a seriatim basis. For projections using original pricing assumptions, discounting and accumulation uses the maximum valuation interest rate for contract reserves at the time of pricing (5.0%).

   The projections for post-stability policies reflect best-estimate assumptions (without explicit margin). While margins for moderately adverse experience (MAE) is allowed for post-stability, we have shown all pre- and post-stability projections using most-likely assumptions to tie to Attachments A of the August 30 response letter.

4. *[F]or each of the four subsets of the business corresponding to the combinations of (lifetime/limited benefit periods) and (no inflation/with inflation protection), please provide the following projections on a nationwide basis:*
   a. *current assumptions and current rates*
   b. *current assumptions and current rates, using actual nationwide premiums (not Virginia rate level)*
   c. *current assumptions and current rates, including paid-up policies (if any)*
   d. *current assumptions with the proposed rate increase*
   e. *current assumptions with the proposed rate increase, but with no shock lapses, benefit reductions, CBUL, or adverse selection*
   f. *current assumptions with premiums restated as if the proposed rate schedule had been in effect from inception*
   g. *original assumptions and original premiums from inception*
   h. *actual past experience (claims, mortality, lapse) but original assumptions in the future, with all premiums at the original premium scale from inception.*

   In addition to the four subsets requested above, bifurcated experience by policy issue date has also been provided. Thus, provided in this response letter is experience for eight subsets of the business corresponding to the combinations of (pre-stability/post-stability), (lifetime/limited benefit periods), and (no inflation/ with inflation protection). Attachments 1 through 8 to this letter provide experience for policies with the requirements outlined in item 3 above and with the following combinations.

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Attachment	Issued On or After October 1, 2003	Benefit Period	Inflation Option
1	No	Limited	None
2			Auto
3		Lifetime	None
4			Auto
5	Yes	Limited	None
6			Auto
7		Lifetime	None
8			Auto

Each of the eight attachments includes seven of the requested projections labeled above as A through H. Please note that no projections were provided for projection labeled C as there are no paid-up policies in this block. The original pricing assumptions used in G and H appear in Exhibit III of the May 2, 2018 actuarial memorandum. No rate increase is being requested on policies without inflation protection; therefore, the projections appearing in A, C, D, E, and F are identical.

These 56 attachments include calendar year earned premiums, incurred claims, annual loss ratios, end of year lives, and cumulative loss ratios. Please note that none of the experience splits provided in these attachments are considered credible, but are being provided as requested. These attachments are also provided in the enclosed Excel workbook, as requested.

We note that G and H use the original pricing assumptions, except for interest. When demonstrating compliance with minimum loss ratio requirements, it is appropriate to use the maximum valuation rate as specified in Virginia regulation. However, when comparing current to original pricing loss ratios it is appropriate to use an earnings rate basis for consistency with that used in the development of the original premiums in order to capture deviations in interest.

Interest is an important assumption in the development of premiums. Regulation that was in effect at the time of pricing did not prohibit interest deviations. If at the time of pricing deviations in interest was not permitted, then additional margin (lower interest) would have been used in the development of premiums. Furthermore, if consumers were to self-fund, they would also be exposed to investment risk and if their invested assets did not grow at the rate expected, they too may not have sufficient funds to cover their future long-term care costs. If consumers were not able to achieve as high of a spread as MedAmerica, then the decrease in the economic environment may have hurt consumers more had they self-funded their long-term care risk rather than purchasing insurance through MedAmerica.

The table below provides the nationwide lifetime loss ratios for the experience similar to that provided in Attachments A, D, and G of Attachments 1 through 8, except uses an earnings rate basis rather than a maximum valuation interest rate basis. Please note that no increase is currently being requested on policies without inflation protection.

Issued On or After October 1, 2003	Benefit Period	Inflation Option	Lifetime Loss Ratio with Earnings Rate			Actual-to-Expected	
			Before Increase	After Increase	Expected	Before Increase	After Increase
No	Limited	None	53%	53%	59%	0.89	0.89
		Auto	81	67	60	1.35	1.12
	Lifetime	None	79	79	66	1.21	1.21
		Auto	137	109	65	2.09	1.67
Yes	Limited	None	48	48	58	0.82	0.82
		Auto	81	61	58	1.39	1.05
	Lifetime	None	87	87	66	1.31	1.31
		Auto	121	86	64	1.88	1.34

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Furthermore, we believe the Bureau's intent of restating the proposed increase from inception in F is to prevent companies from recouping past losses. This approach is one of the most restrictive as it assumes the company could have had perfect knowledge at issue. A number of methods exist to quantify or demonstrate whether an increase may be recouping past losses; several of which have been documented by the NAIC Long-Term Care Pricing Subgroup (Pricing Subgroup) and adopted by select department of insurance actuaries. One of these methods is the "Prospective Present Value (PV)" approach. This approach avoids a recoupment of past losses by considering only future projections of active, premium-paying policyholders. Enclosed with this response is an excerpt from the September 2018 Draft "Approaches to LTC Rate Increases" document circulated by the Pricing Subgroup, which describes this test.

The table below provides the allowable rate increase, split by inflation, using the Prospective PV approach compared to the requested cumulative increase on a nationwide basis (i.e., consistent with that shown in Section 18 of the May 2 actuarial memorandum) for the 515 Series. As can be seen in this table, the requested increase is considerably less than that allowable under the Prospective PV approach.

"Prospective PV" Allowable Increases and
Average Requested Increase by Inflation
Based on Nationwide Experience as of December 31, 2016
Premiums Restated to Reflect No Prior Increase
515 Series

Inflation Option	Nationwide Allowable Increase[1]	Cumulative Requested Increase
Auto	212%	130%
None	86	0

[1] Includes 15% increase in future claims for moderately adverse experience (MAE)

5. *For each of the four subsets of the business above, please provide the active life reserves balance as of the projection date on a nationwide basis.*

The following table provides the active life reserves by benefit period, inflation option, and issue date on a nationwide basis for policies with a lifetime premium payment option only.

Nationwide Lifetime Premium Payment Option Only
Active Life Reserves as of December 31, 2016

Issued On or After October 1, 2003	Benefit Period	Inflation Option	Active Life Reserve
No	Limited	None	$10,808,263
		Auto	43,103,081
	Lifetime	None	2,920,051
		Auto	22,241,454
Yes	Limited	None	2,901,097
		Auto	6,768,080
	Lifetime	None	1,437,962
		Auto	3,270,268
All	All	All	93,450,255

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6. *For each of the four subsets of the business above, please provide the policy count as of the projection date in Virginia.*

   The following table provides the Virginia policy count by benefit period, inflation option, and issue date on a nationwide basis for policies with a lifetime premium payment option only.

Virginia Lifetime Premium Payment Option Only
Policy Count as of December 31, 2016

Issued On or After October 1, 2003	Benefit Period	Inflation Option	Policy Count
No	Limited	None	55
		Auto	58
	Lifetime	None	6
		Auto	28
Yes	Limited	None	3
		Auto	17
	Lifetime	None	0
		Auto	4
All	All	All	171

7. *Please provide the projections supporting Attachments C-1, C-2 and C-3.*

   Attachment 9 provides the projections underlying Attachment C of the August 31 Response to Note to Filer. Please note, each column in Attachment 9 uses the same persistency assumption, which reflects the impact of policyholder behavior due to the rate increase (i.e., contingent benefit upon lapse and reduced benefit option elections). As such, the initial premium (column A) will not tie to that provided in Scenario A of Attachments 1 through 4. Attachment 9 is also included in the enclosed Excel workbook.

8. *Pursuant to 14VAC5-200-153.G.2., the original anticipated lifetime loss ratio should be substituted for 58% in the loss ratio test, if higher. Please revise Attachments E-1, E-2 and E-3 as appropriate. Please also provide the projections supporting these calculations.*

   Attachment 10 to this letter provides similar information as Attachment E of the August 31 Response to Note to Filer except that the 58% is replaced with the original anticipated lifetime loss ratio. Attachment 11 provides the projections underlying Attachment 10. Please note, each column in Attachment 11 uses the same persistency assumption, which reflects the impact of policyholder behavior due to the rate increase (i.e., contingent benefit upon lapse and reduced benefit option elections). As such, the initial premium (column A) will not tie to that provided in Scenario A of Attachments 5 through 8.

   Additionally, to comply with 14VAC5-200-153.G.1, enclosed with this letter is a plan, subject to the Bureau's review, which demonstrates that appropriate administration and claims processing procedures are in effect.

   Please note that the company will voluntarily offer a contingent benefit upon lapse to insureds affected by the rate increase, even if the increase is not considered substantial, as noted in the cover letter.

   The majority of the Virginia policies are not eligible for a contingent benefit upon lapse, pursuant to 14VAC5-200-185.D.3 (CBUL), because the majority are receiving a 0% increase (i.e., no inflation protection). However, because all policies with inflation protection are eligible for a CBUL, we providing the additional information required by 14VAC5-200-153.G.1 and 14VAC5-200-153.G.2 as requested.

This work product was prepared solely to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

Limitations and Qualifications

Milliman's work has been prepared for the use and benefit of MedAmerica. Milliman's work may not be provided to third parties without Milliman's prior written consent. Milliman does not intend to benefit any third party recipient of its work product, even if Milliman consents to the release of its work product to such third party.

Milliman's work is being delivered to the Bureau, in accordance with its statutory and regulatory requirements. Milliman recognizes that materials it delivers to the Bureau may be public records subject to disclosure to third parties, however, Milliman does not intend to benefit and assumes no duty or liability to any third parties, including the Bureau, who receive Milliman's work and may include disclaimer language on its work product so stating. To the extent that Milliman's work is not subject to disclosure under applicable public records laws, the Bureau agrees that it shall not disclose Milliman's work product to third parties without Milliman's prior written consent; provided, however, that the Bureau may distribute Milliman's work to (i) its professional service providers who are subject to a duty of confidentiality and who agree to not use Milliman's work product for any purpose other than to provide services to the Bureau, or (ii) any applicable regulatory or governmental agency, as required.

In performing this analysis, we relied on data and other information provided by MedAmerica. We have not audited or verified this data and other information. If the underlying data or information is inaccurate or incomplete, the results of our analysis may likewise be inaccurate or incomplete. In that event, the results of our analysis may not be suitable for the intended purpose. We performed a limited review of the data used directly in our analysis for reasonableness and consistency and have not found material defects in the data. If there are material defects in the data, it is possible that they would be uncovered by a detailed, systematic review and comparison of the data to search for data values that are questionable or for relationships that are materially inconsistent. Such a review was beyond the scope of our assignment.

Differences between our projections and actual amounts depend on the extent to which future experience conforms to the assumptions made for this analysis. It is certain that actual experience will not conform exactly to the assumptions used in this analysis. Actual amounts will differ from projected amounts to the extent that actual experience deviates from expected experience.

I, Missy Gordon, am a Principal and Consulting Actuary for Milliman, Inc. I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render an actuarial opinion as described herein.

This work product was prepared solely to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

❖❖❖

Bill, thank you for working with us to complete this filing in Virginia. Please let me know if you have any additional questions. You can reach me directly at (952) 820-2478 or by e-mail at missy.gordon@milliman.com. Alternatively, you may contact Michael Emmert, the contact of record for this filing, at (952) 820-3116 or by e-mail at michael.emmert@milliman.com.

Respectfully,

Missy Gordon, FSA, MAAA
Principal and Consulting Actuary

MAG/mmm

Attachment 1:	Nationwide Experience for Policies Issued Prior to October 1, 2003 with Limited Benefit Periods and No Inflation
Attachment 2:	Nationwide Experience for Policies Issued Prior to October 1, 2003 with Limited Benefit Periods and Auto Inflation
Attachment 3:	Nationwide Experience for Policies Issued Prior to October 1, 2003 with Lifetime Benefit Periods and No Inflation
Attachment 4:	Nationwide Experience for Policies Issued Prior to October 1, 2003 with Lifetime Benefit Periods and Auto Inflation
Attachment 5:	Nationwide Experience for Policies Issued On or After October 1, 2003 with Limited Benefit Periods and No Inflation
Attachment 6:	Nationwide Experience for Policies Issued On or After October 1, 2003 with Limited Benefit Periods and Auto Inflation
Attachment 7:	Nationwide Experience for Policies Issued On or After October 1, 2003 with Lifetime Benefit Periods and No Inflation
Attachment 8:	Nationwide Experience for Policies Issued On or After October 1, 2003 with Lifetime Benefit Periods and Auto Inflation
Attachment 9:	Nationwide Experience Underlying the Dual Loss Ratio Test for Policies Issued Prior to October 1, 2003
Attachment 10:	Nationwide Alternative 58%/85% Test for Policies Issued On or After October 1, 2003
Attachment 11:	Nationwide Experience Underlying Alternative 58%/85% Test for Policies Issued On or After October 1, 2003

Enclosures: VA_Response Attachments_MedAmerica_LRRS_20181112.xlsb
Excerpt from September 2018 Draft “Approaches to LTC Rate Increases”
Claims and administration processing plan, as provided by MedAmerica

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Attachment 1A
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	860	0	0%	13	0%
	1998	183,404	0	0%	447	0%
	1999	846,032	37,678	4%	1,507	4%
	2000	1,677,431	2,318	0%	1,938	2%
	2001	2,265,912	116,964	5%	2,608	3%
	2002	3,045,344	72,844	2%	3,254	3%
	2003	3,317,839	80,217	2%	3,274	3%
	2004	3,166,630	416,222	13%	3,030	5%
	2005	2,988,767	257,648	9%	2,870	5%
	2006	2,853,328	1,026,782	36%	2,727	9%
	2007	2,684,894	598,231	22%	2,593	10%
	2008	2,547,189	1,314,605	52%	2,462	14%
	2009	2,396,116	1,201,203	50%	2,289	16%
	2010	2,235,455	1,220,112	55%	2,170	19%
	2011	2,090,115	2,096,095	100%	2,037	23%
	2012	1,951,799	1,342,913	69%	1,909	25%
	2013	1,799,264	1,642,703	91%	1,791	27%
	2014	1,631,546	1,931,089	118%	1,556	30%
	2015	1,394,534	2,162,438	155%	1,401	33%
	2016	1,223,658	2,285,756	187%	1,288	36%
Projected Future Experience (50 Years)	2017	1,108,805	1,595,845	144%	1,189	38%
	2018	1,004,922	1,622,712	161%	1,092	40%
	2019	904,237	1,623,423	180%	995	41%
	2020	807,590	1,593,262	197%	902	43%
	2021	715,751	1,540,318	215%	811	44%
	2022	629,338	1,475,020	234%	724	46%
	2023	548,818	1,401,053	255%	642	47%
	2024	474,519	1,319,351	278%	565	48%
	2025	406,667	1,233,254	303%	493	49%
	2026	345,381	1,140,505	330%	426	50%
	2027	290,620	1,038,638	357%	366	51%
	2028	242,232	932,114	385%	311	52%
	2029	199,953	824,659	412%	262	52%
	2030	163,472	718,012	439%	219	53%
	2031	132,370	615,153	465%	182	53%
	2032	106,145	521,746	492%	149	54%
	2033	84,245	439,898	522%	121	54%
	2034	66,162	366,781	554%	98	54%
	2035	51,430	302,260	588%	78	54%
	2036	39,585	246,051	622%	62	54%
	2037	30,187	198,046	656%	49	55%
	2038	22,823	157,797	691%	38	55%
	2039	17,107	124,805	730%	30	55%
	2040	12,718	98,207	772%	23	55%
	2041	9,389	76,729	817%	18	55%
	2042	6,890	59,471	863%	14	55%
	2043	5,022	45,747	911%	10	55%
	2044	3,651	35,095	961%	8	55%
	2045	2,643	26,935	1,019%	6	55%
	2046	1,910	20,689	1,083%	5	55%
	2047	1,377	15,870	1,152%	4	55%
	2048	995	12,218	1,228%	3	55%
	2049	720	9,349	1,298%	2	55%
	2050	525	7,186	1,369%	2	55%
	2051	386	5,564	1,442%	1	55%
	2052	285	4,354	1,530%	1	55%
	2053	211	3,442	1,632%	1	55%
	2054	158	2,709	1,716%	1	55%
	2055	120	2,163	1,807%	1	55%
	2056	92	1,760	1,917%	0	55%
	2057-2061	229	5,174	2,264%	1	55%
	2062-2066	66	1,906	2,895%	0	55%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	62,742,117	22,521,090	36%
Future	6,680,982	15,541,530	233%
Lifetime	69,423,099	38,062,620	55%

Attachment 1B
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	860	0	0%	13	0%
	1998	183,404	0	0%	447	0%
	1999	846,032	37,678	4%	1,507	4%
	2000	1,677,431	2,318	0%	1,938	2%
	2001	2,265,912	116,964	5%	2,608	3%
	2002	3,045,344	72,844	2%	3,254	3%
	2003	3,317,839	80,217	2%	3,274	3%
	2004	3,166,630	416,222	13%	3,030	5%
	2005	2,988,767	257,648	9%	2,870	5%
	2006	2,853,328	1,026,782	36%	2,727	9%
	2007	2,684,894	598,231	22%	2,593	10%
	2008	2,547,189	1,314,605	52%	2,462	14%
	2009	2,396,116	1,201,203	50%	2,289	16%
	2010	2,235,455	1,220,112	55%	2,170	19%
	2011	2,090,115	2,096,095	100%	2,037	23%
	2012	1,951,799	1,342,913	69%	1,909	25%
	2013	1,799,264	1,642,703	91%	1,791	27%
	2014	1,639,654	1,931,089	118%	1,556	30%
	2015	1,530,182	2,162,438	141%	1,401	33%
	2016	1,450,786	2,285,756	158%	1,288	36%
Projected Future Experience (50 Years)	2017	1,338,561	1,652,879	123%	1,189	37%
	2018	1,215,590	1,680,383	138%	1,092	39%
	2019	1,094,326	1,680,671	154%	995	41%
	2020	977,644	1,649,083	169%	902	42%
	2021	866,794	1,593,993	184%	811	44%
	2022	762,510	1,526,219	200%	724	45%
	2023	665,338	1,449,562	218%	642	47%
	2024	575,665	1,364,988	237%	565	48%
	2025	493,750	1,275,909	258%	493	49%
	2026	419,730	1,180,003	281%	426	50%
	2027	353,551	1,074,703	304%	366	50%
	2028	295,025	964,587	327%	311	51%
	2029	243,837	853,489	350%	262	52%
	2030	199,617	743,201	372%	219	52%
	2031	161,867	636,801	393%	182	53%
	2032	129,990	540,155	416%	149	53%
	2033	103,326	455,450	441%	121	53%
	2034	81,272	379,762	467%	98	53%
	2035	63,272	312,954	495%	78	54%
	2036	48,773	254,742	522%	62	54%
	2037	37,248	205,022	550%	49	54%
	2038	28,200	163,334	579%	38	54%
	2039	21,165	129,162	610%	30	54%
	2040	15,753	101,612	645%	23	54%
	2041	11,642	79,367	682%	18	54%
	2042	8,550	61,495	719%	14	54%
	2043	6,237	47,290	758%	10	54%
	2044	4,537	36,267	799%	8	54%
	2045	3,285	27,826	847%	6	54%
	2046	2,375	21,366	900%	5	54%
	2047	1,712	16,382	957%	4	54%
	2048	1,236	12,608	1,020%	3	54%
	2049	893	9,643	1,079%	2	54%
	2050	650	7,409	1,140%	2	54%
	2051	476	5,735	1,204%	1	54%
	2052	350	4,487	1,281%	1	54%
	2053	259	3,547	1,371%	1	54%
	2054	193	2,791	1,448%	1	54%
	2055	145	2,229	1,534%	1	54%
	2056	111	1,815	1,637%	0	54%
	2057-2061	272	5,340	1,967%	1	54%
	2062-2066	76	1,971	2,583%	0	54%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	63,128,258	22,521,090	36%
Future	8,096,325	16,085,911	199%
Lifetime	71,224,582	38,607,001	54%

Attachment 1D
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	860	0	0%	13	0%
	1998	183,404	0	0%	447	0%
	1999	846,032	37,678	4%	1,507	4%
	2000	1,677,431	2,318	0%	1,938	2%
	2001	2,265,912	116,964	5%	2,608	3%
	2002	3,045,344	72,844	2%	3,254	3%
	2003	3,317,839	80,217	2%	3,274	3%
	2004	3,166,630	416,222	13%	3,030	5%
	2005	2,988,767	257,648	9%	2,870	5%
	2006	2,853,328	1,026,782	36%	2,727	9%
	2007	2,684,894	598,231	22%	2,593	10%
	2008	2,547,189	1,314,605	52%	2,462	14%
	2009	2,396,116	1,201,203	50%	2,289	16%
	2010	2,235,455	1,220,112	55%	2,170	19%
	2011	2,090,115	2,096,095	100%	2,037	23%
	2012	1,951,799	1,342,913	69%	1,909	25%
	2013	1,799,264	1,642,703	91%	1,791	27%
	2014	1,631,546	1,931,089	118%	1,556	30%
	2015	1,394,534	2,162,438	155%	1,401	33%
	2016	1,223,658	2,285,756	187%	1,288	36%
Projected Future Experience (50 Years)	2017	1,108,805	1,595,845	144%	1,189	38%
	2018	1,004,922	1,622,712	161%	1,092	40%
	2019	904,237	1,623,423	180%	995	41%
	2020	807,590	1,593,262	197%	902	43%
	2021	715,751	1,540,318	215%	811	44%
	2022	629,338	1,475,020	234%	724	46%
	2023	548,818	1,401,053	255%	642	47%
	2024	474,519	1,319,351	278%	565	48%
	2025	406,667	1,233,254	303%	493	49%
	2026	345,381	1,140,505	330%	426	50%
	2027	290,620	1,038,638	357%	366	51%
	2028	242,232	932,114	385%	311	52%
	2029	199,953	824,659	412%	262	52%
	2030	163,472	718,012	439%	219	53%
	2031	132,370	615,153	465%	182	53%
	2032	106,145	521,746	492%	149	54%
	2033	84,245	439,898	522%	121	54%
	2034	66,162	366,781	554%	98	54%
	2035	51,430	302,260	588%	78	54%
	2036	39,585	246,051	622%	62	54%
	2037	30,187	198,046	656%	49	55%
	2038	22,823	157,797	691%	38	55%
	2039	17,107	124,805	730%	30	55%
	2040	12,718	98,207	772%	23	55%
	2041	9,389	76,729	817%	18	55%
	2042	6,890	59,471	863%	14	55%
	2043	5,022	45,747	911%	10	55%
	2044	3,651	35,095	961%	8	55%
	2045	2,643	26,935	1,019%	6	55%
	2046	1,910	20,689	1,083%	5	55%
	2047	1,377	15,870	1,152%	4	55%
	2048	995	12,218	1,228%	3	55%
	2049	720	9,349	1,298%	2	55%
	2050	525	7,186	1,369%	2	55%
	2051	386	5,564	1,442%	1	55%
	2052	285	4,354	1,530%	1	55%
	2053	211	3,442	1,632%	1	55%
	2054	158	2,709	1,716%	1	55%
	2055	120	2,163	1,807%	1	55%
	2056	92	1,760	1,917%	0	55%
	2057-2061	229	5,174	2,264%	1	55%
	2062-2066	66	1,906	2,895%	0	55%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	62,742,117	22,521,090	36%
Future	6,680,982	15,541,530	233%
Lifetime	69,423,099	38,062,620	55%

Attachment 1E
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase without RBO, CBUL, and Adverse Selection
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	860	0	0%	13	0%
	1998	183,404	0	0%	447	0%
	1999	846,032	37,678	4%	1,507	4%
	2000	1,677,431	2,318	0%	1,938	2%
	2001	2,265,912	116,964	5%	2,608	3%
	2002	3,045,344	72,844	2%	3,254	3%
	2003	3,317,839	80,217	2%	3,274	3%
	2004	3,166,630	416,222	13%	3,030	5%
	2005	2,988,767	257,648	9%	2,870	5%
	2006	2,853,328	1,026,782	36%	2,727	9%
	2007	2,684,894	598,231	22%	2,593	10%
	2008	2,547,189	1,314,605	52%	2,462	14%
	2009	2,396,116	1,201,203	50%	2,289	16%
	2010	2,235,455	1,220,112	55%	2,170	19%
	2011	2,090,115	2,096,095	100%	2,037	23%
	2012	1,951,799	1,342,913	69%	1,909	25%
	2013	1,799,264	1,642,703	91%	1,791	27%
	2014	1,631,546	1,931,089	118%	1,556	30%
	2015	1,394,534	2,162,438	155%	1,401	33%
	2016	1,223,658	2,285,756	187%	1,288	36%
Projected Future Experience (50 Years)	2017	1,108,805	1,595,845	144%	1,189	38%
	2018	1,004,922	1,622,712	161%	1,092	40%
	2019	904,237	1,623,423	180%	995	41%
	2020	807,590	1,593,262	197%	902	43%
	2021	715,751	1,540,318	215%	811	44%
	2022	629,338	1,475,020	234%	724	46%
	2023	548,818	1,401,053	255%	642	47%
	2024	474,519	1,319,351	278%	565	48%
	2025	406,667	1,233,254	303%	493	49%
	2026	345,381	1,140,505	330%	426	50%
	2027	290,620	1,038,638	357%	366	51%
	2028	242,232	932,114	385%	311	52%
	2029	199,953	824,659	412%	262	52%
	2030	163,472	718,012	439%	219	53%
	2031	132,370	615,153	465%	182	53%
	2032	106,145	521,746	492%	149	54%
	2033	84,245	439,898	522%	121	54%
	2034	66,162	366,781	554%	98	54%
	2035	51,430	302,260	588%	78	54%
	2036	39,585	246,051	622%	62	54%
	2037	30,187	198,046	656%	49	55%
	2038	22,823	157,797	691%	38	55%
	2039	17,107	124,805	730%	30	55%
	2040	12,718	98,207	772%	23	55%
	2041	9,389	76,729	817%	18	55%
	2042	6,890	59,471	863%	14	55%
	2043	5,022	45,747	911%	10	55%
	2044	3,651	35,095	961%	8	55%
	2045	2,643	26,935	1,019%	6	55%
	2046	1,910	20,689	1,083%	5	55%
	2047	1,377	15,870	1,152%	4	55%
	2048	995	12,218	1,228%	3	55%
	2049	720	9,349	1,298%	2	55%
	2050	525	7,186	1,369%	2	55%
	2051	386	5,564	1,442%	1	55%
	2052	285	4,354	1,530%	1	55%
	2053	211	3,442	1,632%	1	55%
	2054	158	2,709	1,716%	1	55%
	2055	120	2,163	1,807%	1	55%
	2056	92	1,760	1,917%	0	55%
	2057-2061	229	5,174	2,264%	1	55%
	2062-2066	66	1,906	2,895%	0	55%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	62,742,117	22,521,090	36%
Future	6,680,982	15,541,530	233%
Lifetime	69,423,099	38,062,620	55%

Attachment 1F
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to Proposed Increase From Inception
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	860	0	0%	13	0%
	1998	183,404	0	0%	447	0%
	1999	846,032	37,678	4%	1,507	4%
	2000	1,677,431	2,318	0%	1,938	2%
	2001	2,265,912	116,964	5%	2,608	3%
	2002	3,045,344	72,844	2%	3,254	3%
	2003	3,317,839	80,217	2%	3,274	3%
	2004	3,166,630	416,222	13%	3,030	5%
	2005	2,988,767	257,648	9%	2,870	5%
	2006	2,853,328	1,026,782	36%	2,727	9%
	2007	2,684,894	598,231	22%	2,593	10%
	2008	2,547,189	1,314,605	52%	2,462	14%
	2009	2,396,116	1,201,203	50%	2,289	16%
	2010	2,235,455	1,220,112	55%	2,170	19%
	2011	2,090,115	2,096,095	100%	2,037	23%
	2012	1,951,799	1,342,913	69%	1,909	25%
	2013	1,799,264	1,642,703	91%	1,791	27%
	2014	1,631,546	1,931,089	118%	1,556	30%
	2015	1,394,534	2,162,438	155%	1,401	33%
	2016	1,223,658	2,285,756	187%	1,288	36%
Projected Future Experience (50 Years)	2017	1,108,805	1,595,845	144%	1,189	38%
	2018	1,004,922	1,622,712	161%	1,092	40%
	2019	904,237	1,623,423	180%	995	41%
	2020	807,590	1,593,262	197%	902	43%
	2021	715,751	1,540,318	215%	811	44%
	2022	629,338	1,475,020	234%	724	46%
	2023	548,818	1,401,053	255%	642	47%
	2024	474,519	1,319,351	278%	565	48%
	2025	406,667	1,233,254	303%	493	49%
	2026	345,381	1,140,505	330%	426	50%
	2027	290,620	1,038,638	357%	366	51%
	2028	242,232	932,114	385%	311	52%
	2029	199,953	824,659	412%	262	52%
	2030	163,472	718,012	439%	219	53%
	2031	132,370	615,153	465%	182	53%
	2032	106,145	521,746	492%	149	54%
	2033	84,245	439,898	522%	121	54%
	2034	66,162	366,781	554%	98	54%
	2035	51,430	302,260	588%	78	54%
	2036	39,585	246,051	622%	62	54%
	2037	30,187	198,046	656%	49	55%
	2038	22,823	157,797	691%	38	55%
	2039	17,107	124,805	730%	30	55%
	2040	12,718	98,207	772%	23	55%
	2041	9,389	76,729	817%	18	55%
	2042	6,890	59,471	863%	14	55%
	2043	5,022	45,747	911%	10	55%
	2044	3,651	35,095	961%	8	55%
	2045	2,643	26,935	1,019%	6	55%
	2046	1,910	20,689	1,083%	5	55%
	2047	1,377	15,870	1,152%	4	55%
	2048	995	12,218	1,228%	3	55%
	2049	720	9,349	1,298%	2	55%
	2050	525	7,186	1,369%	2	55%
	2051	386	5,564	1,442%	1	55%
	2052	285	4,354	1,530%	1	55%
	2053	211	3,442	1,632%	1	55%
	2054	158	2,709	1,716%	1	55%
	2055	120	2,163	1,807%	1	55%
	2056	92	1,760	1,917%	0	55%
	2057-2061	229	5,174	2,264%	1	55%
	2062-2066	66	1,906	2,895%	0	55%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	62,742,117	22,521,090	36%
Future	6,680,982	15,541,530	233%
Lifetime	69,423,099	38,062,620	55%

Attachment 1G
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Expected Experience
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Limited Benefit Periods

		Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
	1997	799	183	23%	13	23%
	1998	178,927	48,907	27%	442	27%
	1999	834,594	226,941	27%	1,488	27%
	2000	1,699,266	482,394	28%	1,933	28%
	2001	2,260,662	691,520	31%	2,558	29%
	2002	2,993,411	952,035	32%	3,114	30%
	2003	3,170,936	1,081,723	34%	3,012	31%
	2004	2,856,070	1,100,908	39%	2,633	32%
	2005	2,509,653	1,106,674	44%	2,330	34%
	2006	2,222,073	1,117,646	50%	2,076	36%
	2007	1,973,431	1,130,208	57%	1,854	37%
	2008	1,753,132	1,141,521	65%	1,657	39%
	2009	1,555,081	1,148,702	74%	1,478	41%
	2010	1,375,751	1,150,892	84%	1,316	43%
	2011	1,213,686	1,147,634	95%	1,170	44%
	2012	1,067,737	1,138,632	107%	1,039	46%
	2013	936,375	1,123,074	120%	919	48%
	2014	817,954	1,099,225	134%	811	49%
	2015	711,565	1,067,645	150%	714	51%
Projected	2016	616,083	1,028,195	167%	625	52%
Experience	2017	530,645	980,899	185%	546	53%
	2018	454,717	927,574	204%	474	55%
	2019	387,600	869,026	224%	411	56%
	2020	328,454	806,299	245%	354	57%
	2021	276,559	740,863	268%	303	57%
	2022	231,359	673,771	291%	258	58%
	2023	192,227	606,663	316%	218	59%
	2024	158,534	540,338	341%	183	59%
	2025	129,744	476,036	367%	153	60%
	2026	105,353	414,791	394%	127	60%
	2027	84,875	357,223	421%	104	61%
	2028	67,839	304,487	449%	85	61%
	2029	53,784	256,935	478%	69	61%
	2030	42,304	214,744	508%	56	61%
	2031	33,007	177,650	538%	45	61%
	2032	25,550	145,476	569%	36	62%
	2033	19,622	118,082	602%	28	62%
	2034	14,955	95,095	636%	22	62%
	2035	11,314	76,025	672%	17	62%
	2036	8,500	60,334	710%	13	62%
	2037	6,344	47,547	749%	10	62%
	2038	4,706	37,204	791%	8	62%
	2039	3,469	28,947	835%	6	62%
	2040	2,542	22,423	882%	5	62%
	2041	1,854	17,282	932%	4	62%
	2042	1,347	13,263	984%	3	62%
	2043	978	10,149	1,038%	2	62%
	2044	709	7,749	1,094%	2	62%
	2045	513	5,917	1,153%	1	62%
	2046	372	4,516	1,214%	1	62%
	2047	270	3,455	1,279%	1	62%
	2048	197	2,655	1,351%	1	62%
	2049	143	2,041	1,426%	0	62%
	2050	106	1,586	1,500%	0	62%
	2051	79	1,245	1,575%	0	62%
	2052	60	987	1,657%	0	62%
	2053	45	786	1,745%	0	62%
	2054	34	631	1,837%	0	62%
	2055	26	511	1,935%	0	62%
	2056	20	415	2,037%	0	62%
	2057-2061	49	1,139	2,305%	0	62%
	2062-2066	12	344	2,834%	0	62%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	52,854,602	27,515,617	52%
Future	2,561,054	6,778,792	265%
Lifetime	55,415,656	34,294,409	62%

Attachment 1H
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	860	0	0%	13	0%
	1998	183,404	0	0%	447	0%
	1999	846,032	37,678	4%	1,507	4%
	2000	1,677,431	2,318	0%	1,938	2%
	2001	2,265,912	116,964	5%	2,608	3%
	2002	3,045,344	72,844	2%	3,254	3%
	2003	3,317,839	80,217	2%	3,274	3%
	2004	3,166,630	416,222	13%	3,030	5%
	2005	2,988,767	257,648	9%	2,870	5%
	2006	2,853,328	1,026,782	36%	2,727	9%
	2007	2,684,894	598,231	22%	2,593	10%
	2008	2,547,189	1,314,605	52%	2,462	14%
	2009	2,396,116	1,201,203	50%	2,289	16%
	2010	2,235,455	1,220,112	55%	2,170	18%
	2011	2,090,115	2,096,095	100%	2,037	22%
	2012	1,951,799	1,342,913	69%	1,909	24%
	2013	1,799,264	1,642,703	91%	1,791	27%
	2014	1,631,546	1,931,089	118%	1,556	29%
	2015	1,394,534	2,162,438	155%	1,401	32%
	2016	1,223,658	2,285,756	187%	1,288	35%
Projected Future Experience (50 Years)	2017	1,081,074	1,962,587	182%	1,126	37%
	2018	930,233	1,861,496	200%	980	39%
	2019	795,911	1,749,556	220%	849	41%
	2020	676,708	1,627,460	240%	731	43%
	2021	571,415	1,496,688	262%	626	44%
	2022	479,122	1,361,086	284%	533	46%
	2023	398,767	1,224,162	307%	451	47%
	2024	329,257	1,088,519	331%	379	48%
	2025	269,635	956,568	355%	315	48%
	2026	218,974	830,162	379%	261	49%
	2027	176,342	711,412	403%	214	50%
	2028	140,806	602,999	428%	174	50%
	2029	111,432	505,662	454%	141	50%
	2030	87,478	419,525	480%	113	51%
	2031	68,095	344,067	505%	90	51%
	2032	52,558	279,151	531%	71	51%
	2033	40,218	224,339	558%	56	51%
	2034	30,522	178,807	586%	44	51%
	2035	22,982	141,398	615%	34	51%
	2036	17,170	110,824	645%	26	51%
	2037	12,729	86,136	677%	20	51%
	2038	9,370	66,422	709%	15	51%
	2039	6,848	50,917	744%	11	51%
	2040	4,967	38,829	782%	9	51%
	2041	3,587	29,474	822%	6	51%
	2042	2,572	22,220	864%	5	51%
	2043	1,832	16,659	909%	4	51%
	2044	1,299	12,428	956%	3	52%
	2045	918	9,252	1,008%	2	52%
	2046	645	6,869	1,065%	1	52%
	2047	452	5,099	1,128%	1	52%
	2048	315	3,784	1,200%	1	52%
	2049	219	2,786	1,273%	1	52%
	2050	154	2,070	1,346%	0	52%
	2051	109	1,544	1,421%	0	52%
	2052	77	1,154	1,508%	0	52%
	2053	54	866	1,602%	0	52%
	2054	39	654	1,690%	0	52%
	2055	28	500	1,783%	0	52%
	2056	21	386	1,884%	0	52%
	2057-2061	44	930	2,125%	0	52%
	2062-2066	9	236	2,548%	0	52%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	65,982,766	23,138,464	35%
Future	5,266,504	13,563,634	258%
Lifetime	71,249,270	36,702,099	52%

Attachment 2A
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	453	0	0%	8	0%
	1998	127,358	0	0%	246	0%
	1999	571,521	0	0%	911	0%
	2000	1,376,105	165,823	12%	1,544	8%
	2001	2,226,310	145,833	7%	2,430	7%
	2002	3,198,406	173,328	5%	3,145	6%
	2003	3,619,531	38,793	1%	3,220	5%
	2004	3,472,096	253,385	7%	2,979	5%
	2005	3,259,061	803,662	25%	2,807	9%
	2006	3,128,132	510,866	16%	2,690	10%
	2007	3,005,969	578,539	19%	2,585	11%
	2008	2,893,182	833,776	29%	2,483	12%
	2009	2,771,218	1,066,645	38%	2,361	14%
	2010	2,635,602	798,836	30%	2,257	15%
	2011	2,512,718	1,354,310	54%	2,164	17%
	2012	2,421,703	1,536,381	63%	2,096	20%
	2013	2,331,696	1,459,739	63%	2,017	22%
	2014	2,209,244	1,019,590	46%	1,851	23%
	2015	2,018,902	1,993,092	99%	1,720	25%
	2016	1,871,283	2,593,875	139%	1,614	28%
Projected Future Experience (50 Years)	2017	1,754,285	2,194,160	125%	1,531	30%
	2018	1,649,217	2,450,059	149%	1,447	33%
	2019	1,543,112	2,698,537	175%	1,362	36%
	2020	1,436,602	2,925,812	204%	1,277	38%
	2021	1,330,366	3,136,086	236%	1,192	41%
	2022	1,225,081	3,341,076	273%	1,106	44%
	2023	1,121,391	3,544,467	316%	1,022	47%
	2024	1,019,939	3,734,134	366%	939	50%
	2025	921,419	3,905,145	424%	858	53%
	2026	826,520	4,043,336	489%	779	56%
	2027	735,925	4,129,482	561%	703	59%
	2028	650,283	4,163,467	640%	630	62%
	2029	570,171	4,136,879	726%	562	64%
	2030	496,104	4,045,480	815%	497	67%
	2031	428,418	3,900,571	910%	438	69%
	2032	367,163	3,740,072	1,019%	383	71%
	2033	312,181	3,575,350	1,145%	332	73%
	2034	263,323	3,388,955	1,287%	287	75%
	2035	220,413	3,185,632	1,445%	246	77%
	2036	183,157	2,970,337	1,622%	209	78%
	2037	151,137	2,739,547	1,813%	177	79%
	2038	123,863	2,503,229	2,021%	149	81%
	2039	100,821	2,268,039	2,250%	125	82%
	2040	81,527	2,040,152	2,502%	104	82%
	2041	65,519	1,823,046	2,782%	86	83%
	2042	52,344	1,613,951	3,083%	70	84%
	2043	41,577	1,416,442	3,407%	58	84%
	2044	32,856	1,234,405	3,757%	47	85%
	2045	25,849	1,070,109	4,140%	38	85%
	2046	20,237	922,249	4,557%	31	85%
	2047	15,786	790,956	5,011%	25	86%
	2048	12,282	675,728	5,502%	20	86%
	2049	9,540	575,979	6,037%	16	86%
	2050	7,407	489,877	6,613%	13	86%
	2051	5,756	414,170	7,195%	11	86%
	2052	4,474	346,096	7,736%	9	86%
	2053	3,482	288,507	8,287%	7	86%
	2054	2,713	239,887	8,842%	6	86%
	2055	2,122	199,664	9,410%	5	87%
	2056	1,666	165,864	9,958%	4	87%
	2057-2061	4,330	492,943	11,385%	10	87%
	2062-2066	1,309	199,031	15,208%	3	87%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	69,322,324	19,471,561	28%
Future	13,265,349	52,126,907	393%
Lifetime	82,587,673	71,598,469	87%

Attachment 2B
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	453	0	0%	8	0%
	1998	127,358	0	0%	246	0%
	1999	571,521	0	0%	911	0%
	2000	1,376,105	165,823	12%	1,544	8%
	2001	2,226,310	145,833	7%	2,430	7%
	2002	3,198,406	173,328	5%	3,145	6%
	2003	3,619,531	38,793	1%	3,220	5%
	2004	3,472,096	253,385	7%	2,979	5%
	2005	3,259,061	803,662	25%	2,807	9%
	2006	3,128,132	510,866	16%	2,690	10%
	2007	3,005,969	578,539	19%	2,585	11%
	2008	2,893,182	833,776	29%	2,483	12%
	2009	2,771,218	1,066,645	38%	2,361	14%
	2010	2,635,602	798,836	30%	2,257	15%
	2011	2,512,718	1,354,310	54%	2,164	17%
	2012	2,421,703	1,536,381	63%	2,096	20%
	2013	2,331,696	1,459,739	63%	2,017	22%
	2014	2,219,862	1,019,590	46%	1,851	23%
	2015	2,204,636	1,993,092	90%	1,720	25%
	2016	2,222,735	2,593,875	117%	1,614	28%
Projected Future Experience (50 Years)	2017	2,147,134	2,272,987	106%	1,531	30%
	2018	2,043,015	2,538,558	124%	1,447	33%
	2019	1,928,995	2,795,483	145%	1,362	35%
	2020	1,799,529	3,030,054	168%	1,277	38%
	2021	1,667,746	3,246,829	195%	1,192	41%
	2022	1,537,028	3,458,000	225%	1,106	43%
	2023	1,408,176	3,667,399	260%	1,022	46%
	2024	1,281,991	3,862,499	301%	939	49%
	2025	1,159,327	4,038,173	348%	858	52%
	2026	1,041,043	4,179,880	402%	779	55%
	2027	927,998	4,267,757	460%	703	58%
	2028	821,007	4,301,728	524%	630	60%
	2029	720,800	4,273,186	593%	562	63%
	2030	628,029	4,177,799	665%	497	65%
	2031	543,126	4,027,278	741%	438	68%
	2032	466,168	3,860,810	828%	383	70%
	2033	396,976	3,690,102	930%	332	72%
	2034	335,386	3,497,116	1,043%	287	73%
	2035	281,196	3,286,772	1,169%	246	75%
	2036	234,058	3,064,215	1,309%	209	76%
	2037	193,468	2,825,801	1,461%	177	78%
	2038	158,827	2,581,752	1,626%	149	79%
	2039	129,507	2,338,948	1,806%	125	80%
	2040	104,907	2,103,780	2,005%	104	81%
	2041	84,458	1,879,826	2,226%	86	81%
	2042	67,596	1,664,175	2,462%	70	82%
	2043	53,791	1,460,492	2,715%	58	82%
	2044	42,588	1,272,772	2,989%	47	83%
	2045	33,569	1,103,383	3,287%	38	83%
	2046	26,330	950,974	3,612%	31	84%
	2047	20,579	815,653	3,964%	25	84%
	2048	16,043	696,890	4,344%	20	84%
	2049	12,485	594,079	4,758%	16	84%
	2050	9,711	505,331	5,204%	13	84%
	2051	7,559	427,294	5,653%	11	84%
	2052	5,884	357,123	6,069%	9	84%
	2053	4,585	297,747	6,494%	7	85%
	2054	3,577	247,607	6,922%	6	85%
	2055	2,800	206,117	7,360%	5	85%
	2056	2,200	171,241	7,783%	4	85%
	2057-2061	5,730	508,907	8,881%	10	85%
	2062-2066	1,740	205,336	11,798%	3	85%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	69,891,859	19,471,561	28%
Future	16,599,147	53,878,044	325%
Lifetime	86,491,006	73,349,605	85%

Attachment 2D
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	453	0	0%	8	0%
	1998	127,358	0	0%	246	0%
	1999	571,521	0	0%	911	0%
	2000	1,376,105	165,823	12%	1,544	8%
	2001	2,226,310	145,833	7%	2,430	7%
	2002	3,198,406	173,328	5%	3,145	6%
	2003	3,619,531	38,793	1%	3,220	5%
	2004	3,472,096	253,385	7%	2,979	5%
	2005	3,259,061	803,662	25%	2,807	9%
	2006	3,128,132	510,866	16%	2,690	10%
	2007	3,005,969	578,539	19%	2,585	11%
	2008	2,893,182	833,776	29%	2,483	12%
	2009	2,771,218	1,066,645	38%	2,361	14%
	2010	2,635,602	798,836	30%	2,257	15%
	2011	2,512,718	1,354,310	54%	2,164	17%
	2012	2,421,703	1,536,381	63%	2,096	20%
	2013	2,331,696	1,459,739	63%	2,017	22%
	2014	2,209,244	1,019,590	46%	1,851	23%
	2015	2,018,902	1,993,092	99%	1,720	25%
	2016	1,871,283	2,593,875	139%	1,614	28%
Projected Future Experience (50 Years)	2017	1,754,285	2,194,160	125%	1,531	30%
	2018	1,834,460	2,408,419	131%	1,379	33%
	2019	2,711,988	2,414,531	89%	1,226	35%
	2020	2,693,628	2,571,662	95%	1,149	36%
	2021	2,494,436	2,751,146	110%	1,072	38%
	2022	2,297,028	2,925,305	127%	996	40%
	2023	2,102,608	3,097,575	147%	920	42%
	2024	1,912,385	3,257,538	170%	845	44%
	2025	1,727,661	3,401,013	197%	772	47%
	2026	1,549,725	3,515,808	227%	701	49%
	2027	1,379,859	3,585,368	260%	633	51%
	2028	1,219,280	3,609,826	296%	567	53%
	2029	1,069,071	3,582,048	335%	505	55%
	2030	930,195	3,498,538	376%	448	57%
	2031	803,284	3,369,230	419%	394	58%
	2032	688,432	3,226,975	469%	344	60%
	2033	585,340	3,081,625	526%	299	61%
	2034	493,731	2,918,124	591%	258	63%
	2035	413,274	2,740,573	663%	221	64%
	2036	343,420	2,553,232	743%	188	65%
	2037	283,382	2,353,066	830%	159	66%
	2038	232,242	2,148,598	925%	134	67%
	2039	189,040	1,945,487	1,029%	112	68%
	2040	152,864	1,748,986	1,144%	93	68%
	2041	122,849	1,562,028	1,272%	77	69%
	2042	98,144	1,382,195	1,408%	63	69%
	2043	77,957	1,212,504	1,555%	52	70%
	2044	61,605	1,056,242	1,715%	42	70%
	2045	48,466	915,316	1,889%	34	70%
	2046	37,943	788,570	2,078%	28	70%
	2047	29,598	676,093	2,284%	23	71%
	2048	23,029	577,429	2,507%	18	71%
	2049	17,888	492,059	2,751%	15	71%
	2050	13,889	418,401	3,013%	12	71%
	2051	10,793	353,665	3,277%	10	71%
	2052	8,389	295,480	3,522%	8	71%
	2053	6,528	246,271	3,773%	6	71%
	2054	5,087	204,737	4,025%	5	71%
	2055	3,979	170,385	4,283%	4	71%
	2056	3,123	141,524	4,531%	3	71%
	2057-2061	8,118	420,490	5,180%	9	71%
	2062-2066	2,454	169,713	6,916%	3	71%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	69,322,324	19,471,561	28%
Future	22,031,041	45,812,373	208%
Lifetime	91,353,365	65,283,934	71%

Attachment 2E
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase without RBO, CBUL, and Adverse Selection
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	453	0	0%	8	0%
	1998	127,358	0	0%	246	0%
	1999	571,521	0	0%	911	0%
	2000	1,376,105	165,823	12%	1,544	8%
	2001	2,226,310	145,833	7%	2,430	7%
	2002	3,198,406	173,328	5%	3,145	6%
	2003	3,619,531	38,793	1%	3,220	5%
	2004	3,472,096	253,385	7%	2,979	5%
	2005	3,259,061	803,662	25%	2,807	9%
	2006	3,128,132	510,866	16%	2,690	10%
	2007	3,005,969	578,539	19%	2,585	11%
	2008	2,893,182	833,776	29%	2,483	12%
	2009	2,771,218	1,066,645	38%	2,361	14%
	2010	2,635,602	798,836	30%	2,257	15%
	2011	2,512,718	1,354,310	54%	2,164	17%
	2012	2,421,703	1,536,381	63%	2,096	20%
	2013	2,331,696	1,459,739	63%	2,017	22%
	2014	2,209,244	1,019,590	46%	1,851	23%
	2015	2,018,902	1,993,092	99%	1,720	25%
	2016	1,871,283	2,593,875	139%	1,614	28%
Projected Future Experience (50 Years)	2017	1,754,285	2,194,160	125%	1,531	30%
	2018	1,924,435	2,462,352	128%	1,447	33%
	2019	3,279,728	2,778,875	85%	1,362	35%
	2020	3,304,184	3,018,729	91%	1,277	37%
	2021	3,059,841	3,229,416	106%	1,192	39%
	2022	2,817,687	3,433,851	122%	1,106	41%
	2023	2,579,199	3,636,069	141%	1,022	43%
	2024	2,345,859	3,823,840	163%	939	46%
	2025	2,119,264	3,992,258	188%	858	48%
	2026	1,900,996	4,127,009	217%	779	51%
	2027	1,692,627	4,208,662	249%	703	53%
	2028	1,495,650	4,237,372	283%	630	55%
	2029	1,311,394	4,204,764	321%	562	57%
	2030	1,141,039	4,106,737	360%	497	59%
	2031	985,362	3,954,950	401%	438	61%
	2032	844,476	3,787,964	449%	383	63%
	2033	718,017	3,617,346	504%	332	65%
	2034	605,644	3,425,421	566%	287	66%
	2035	506,950	3,217,004	635%	246	67%
	2036	421,262	2,997,096	711%	209	69%
	2037	347,615	2,762,131	795%	177	70%
	2038	284,884	2,522,118	885%	149	71%
	2039	231,889	2,283,698	985%	125	72%
	2040	187,513	2,053,037	1,095%	104	72%
	2041	150,694	1,833,577	1,217%	86	73%
	2042	120,390	1,622,481	1,348%	70	73%
	2043	95,627	1,423,291	1,488%	58	74%
	2044	75,569	1,239,863	1,641%	47	74%
	2045	59,452	1,074,437	1,807%	38	74%
	2046	46,544	925,658	1,989%	31	75%
	2047	36,307	793,627	2,186%	25	75%
	2048	28,249	677,811	2,399%	20	75%
	2049	21,942	577,601	2,632%	16	75%
	2050	17,037	491,137	2,883%	13	75%
	2051	13,239	415,147	3,136%	11	75%
	2052	10,290	346,847	3,371%	9	76%
	2053	8,007	289,084	3,610%	7	76%
	2054	6,240	240,330	3,851%	6	76%
	2055	4,880	200,005	4,098%	5	76%
	2056	3,831	166,127	4,336%	4	76%
	2057-2061	9,958	493,590	4,957%	10	76%
	2062-2066	3,010	199,217	6,618%	3	76%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	69,322,324	19,471,561	28%
Future	26,288,662	53,012,344	202%
Lifetime	95,610,986	72,483,905	76%

Attachment 2F
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to Proposed Increase From Inception
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	1,043	0	0%	8	0%
	1998	292,924	0	0%	246	0%
	1999	1,314,498	0	0%	911	0%
	2000	3,165,043	165,823	5%	1,544	3%
	2001	5,120,512	145,833	3%	2,430	3%
	2002	7,356,333	173,328	2%	3,145	3%
	2003	8,324,922	38,793	0%	3,220	2%
	2004	7,985,821	253,385	3%	2,979	2%
	2005	7,495,839	803,662	11%	2,807	4%
	2006	7,194,703	510,866	7%	2,690	4%
	2007	6,913,729	578,539	8%	2,585	5%
	2008	6,654,319	833,776	13%	2,483	5%
	2009	6,373,800	1,066,645	17%	2,361	6%
	2010	6,061,885	798,836	13%	2,257	7%
	2011	5,779,251	1,354,310	23%	2,164	8%
	2012	5,569,916	1,536,381	28%	2,096	9%
	2013	5,362,902	1,459,739	27%	2,017	9%
	2014	5,081,262	1,019,590	20%	1,851	10%
	2015	4,643,475	1,993,092	43%	1,720	11%
	2016	4,303,951	2,593,875	60%	1,614	12%
Projected Future Experience (50 Years)	2017	4,034,855	2,357,127	58%	1,531	13%
	2018	3,793,198	2,626,672	69%	1,447	15%
	2019	3,549,157	2,887,320	81%	1,362	16%
	2020	3,304,183	3,124,385	95%	1,277	17%
	2021	3,059,841	3,342,445	109%	1,192	18%
	2022	2,817,687	3,554,036	126%	1,106	20%
	2023	2,579,198	3,763,332	146%	1,022	21%
	2024	2,345,859	3,957,674	169%	939	22%
	2025	2,119,263	4,131,987	195%	858	24%
	2026	1,900,995	4,271,454	225%	779	25%
	2027	1,692,627	4,355,965	257%	703	27%
	2028	1,495,650	4,385,680	293%	630	28%
	2029	1,311,394	4,351,931	332%	562	29%
	2030	1,141,039	4,250,473	373%	497	30%
	2031	985,362	4,093,373	415%	438	31%
	2032	844,476	3,920,543	464%	383	32%
	2033	718,017	3,743,953	521%	332	33%
	2034	605,644	3,545,311	585%	287	34%
	2035	506,950	3,329,600	657%	246	35%
	2036	421,262	3,101,994	736%	209	35%
	2037	347,615	2,858,806	822%	177	36%
	2038	284,884	2,610,392	916%	149	36%
	2039	231,889	2,363,627	1,019%	125	37%
	2040	187,513	2,124,893	1,133%	104	37%
	2041	150,694	1,897,752	1,259%	86	38%
	2042	120,390	1,679,267	1,395%	70	38%
	2043	95,627	1,473,106	1,540%	58	38%
	2044	75,569	1,283,258	1,698%	47	38%
	2045	59,452	1,112,043	1,870%	38	39%
	2046	46,544	958,056	2,058%	31	39%
	2047	36,307	821,404	2,262%	25	39%
	2048	28,249	701,535	2,483%	20	39%
	2049	21,942	597,817	2,725%	16	39%
	2050	17,037	508,327	2,984%	13	39%
	2051	13,239	429,677	3,246%	11	39%
	2052	10,290	358,987	3,489%	9	39%
	2053	8,007	299,201	3,737%	7	39%
	2054	6,240	248,741	3,986%	6	39%
	2055	4,880	207,005	4,242%	5	39%
	2056	3,831	171,941	4,488%	4	39%
	2057-2061	9,958	510,865	5,130%	10	39%
	2062-2066	3,010	206,189	6,850%	3	39%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	159,441,343	19,471,561	12%
Future	30,510,302	55,035,235	180%
Lifetime	189,951,645	74,506,796	39%

Attachment 2G
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Expected Experience
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
	1997	425	32	8%	8	8%
	1998	126,054	16,551	13%	249	13%
	1999	582,961	78,039	13%	943	13%
	2000	1,406,690	195,748	14%	1,578	14%
	2001	2,284,461	337,101	15%	2,503	14%
	2002	3,257,793	500,599	15%	3,205	15%
	2003	3,624,624	608,209	17%	3,197	15%
	2004	3,300,112	647,807	20%	2,780	16%
	2005	2,894,222	679,454	23%	2,461	17%
	2006	2,573,503	721,346	28%	2,201	18%
	2007	2,304,476	772,294	34%	1,976	20%
	2008	2,069,409	830,280	40%	1,777	21%
	2009	1,859,279	893,828	48%	1,599	23%
	2010	1,669,872	962,426	58%	1,438	24%
	2011	1,499,058	1,036,212	69%	1,294	26%
	2012	1,344,898	1,114,517	83%	1,164	28%
	2013	1,205,757	1,195,788	99%	1,047	30%
	2014	1,080,129	1,278,628	118%	942	31%
	2015	966,261	1,360,524	141%	847	33%
Projected	2016	862,759	1,439,023	167%	760	35%
Experience	2017	768,796	1,513,042	197%	682	37%
	2018	683,709	1,582,032	231%	611	39%
	2019	606,717	1,644,738	271%	548	42%
	2020	536,923	1,697,922	316%	489	44%
	2021	473,593	1,738,794	367%	436	46%
	2022	416,189	1,765,363	424%	388	48%
	2023	364,034	1,775,633	488%	344	49%
	2024	316,596	1,767,539	558%	303	51%
	2025	273,662	1,740,528	636%	265	53%
	2026	235,078	1,694,794	721%	231	54%
	2027	200,654	1,632,948	814%	201	56%
	2028	170,168	1,558,707	916%	173	57%
	2029	143,374	1,474,132	1,028%	148	58%
	2030	120,010	1,382,133	1,152%	127	60%
	2031	99,806	1,284,818	1,287%	108	61%
	2032	82,481	1,184,582	1,436%	91	61%
	2033	67,750	1,083,957	1,600%	76	62%
	2034	55,330	984,956	1,780%	64	63%
	2035	44,939	889,864	1,980%	53	63%
	2036	36,315	799,067	2,200%	44	64%
	2037	29,204	712,747	2,441%	37	64%
	2038	23,382	631,915	2,703%	30	65%
	2039	18,644	556,893	2,987%	25	65%
	2040	14,809	488,250	3,297%	20	65%
	2041	11,723	425,988	3,634%	16	65%
	2042	9,250	369,778	3,997%	13	65%
	2043	7,278	319,406	4,389%	11	66%
	2044	5,712	274,680	4,808%	9	66%
	2045	4,475	235,523	5,263%	7	66%
	2046	3,500	201,352	5,752%	6	66%
	2047	2,735	171,557	6,273%	5	66%
	2048	2,136	145,801	6,826%	4	66%
	2049	1,671	123,753	7,407%	3	66%
	2050	1,310	105,131	8,025%	2	66%
	2051	1,029	89,338	8,682%	2	66%
	2052	810	75,843	9,360%	2	66%
	2053	639	64,433	10,078%	1	66%
	2054	506	54,808	10,838%	1	66%
	2055	401	46,732	11,665%	1	66%
	2056	318	40,018	12,584%	1	66%
	2057-2061	842	130,025	15,437%	2	66%
	2062-2066	262	61,241	23,412%	1	66%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	58,727,737	20,797,548	35%
Future	4,462,492	20,988,832	470%
Lifetime	63,190,229	41,786,380	66%

Attachment 2H
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	453	0	0%	8	0%
	1998	127,358	0	0%	246	0%
	1999	571,521	0	0%	911	0%
	2000	1,376,105	165,823	12%	1,544	8%
	2001	2,226,310	145,833	7%	2,430	7%
	2002	3,198,406	173,328	5%	3,145	6%
	2003	3,619,531	38,793	1%	3,220	5%
	2004	3,472,096	253,385	7%	2,979	5%
	2005	3,259,061	803,662	25%	2,807	9%
	2006	3,128,132	510,866	16%	2,690	10%
	2007	3,005,969	578,539	19%	2,585	11%
	2008	2,893,182	833,776	29%	2,483	12%
	2009	2,771,218	1,066,645	38%	2,361	14%
	2010	2,635,602	798,836	30%	2,257	15%
	2011	2,512,718	1,354,310	54%	2,164	17%
	2012	2,421,703	1,536,381	63%	2,096	19%
	2013	2,331,696	1,459,739	63%	2,017	21%
	2014	2,209,244	1,019,590	46%	1,851	22%
	2015	2,018,902	1,993,092	99%	1,720	25%
	2016	1,871,283	2,593,875	139%	1,614	28%
Projected Future Experience (50 Years)	2017	1,702,874	3,390,241	199%	1,442	31%
	2018	1,508,238	3,520,349	233%	1,286	35%
	2019	1,332,337	3,633,112	273%	1,146	39%
	2020	1,173,349	3,721,038	317%	1,019	42%
	2021	1,029,505	3,778,896	367%	903	46%
	2022	899,592	3,802,946	423%	798	49%
	2023	782,111	3,793,625	485%	702	52%
	2024	675,861	3,743,484	554%	614	55%
	2025	580,292	3,650,408	629%	534	58%
	2026	494,962	3,518,655	711%	462	60%
	2027	419,353	3,355,158	800%	398	62%
	2028	352,875	3,170,935	899%	340	65%
	2029	294,882	2,969,134	1,007%	289	66%
	2030	244,706	2,754,218	1,126%	245	68%
	2031	201,664	2,532,193	1,256%	206	69%
	2032	165,065	2,306,729	1,397%	172	71%
	2033	134,217	2,085,288	1,554%	143	72%
	2034	108,436	1,871,148	1,726%	118	73%
	2035	87,062	1,667,463	1,915%	97	74%
	2036	69,488	1,476,114	2,124%	80	74%
	2037	55,146	1,295,741	2,350%	65	75%
	2038	43,526	1,128,642	2,593%	53	75%
	2039	34,172	976,265	2,857%	42	76%
	2040	26,688	839,162	3,144%	34	76%
	2041	20,742	716,814	3,456%	27	76%
	2042	16,037	608,322	3,793%	22	76%
	2043	12,343	513,069	4,157%	17	77%
	2044	9,455	430,696	4,555%	14	77%
	2045	7,218	360,229	4,991%	11	77%
	2046	5,483	299,440	5,461%	8	77%
	2047	4,150	247,051	5,953%	7	77%
	2048	3,133	202,971	6,479%	5	77%
	2049	2,363	166,313	7,038%	4	77%
	2050	1,784	135,985	7,621%	3	77%
	2051	1,345	110,576	8,220%	2	77%
	2052	1,012	89,144	8,806%	2	77%
	2053	761	71,699	9,422%	2	77%
	2054	571	57,410	10,051%	1	77%
	2055	429	45,961	10,713%	1	77%
	2056	322	36,720	11,403%	1	77%
	2057-2061	733	97,936	13,363%	2	77%
	2062-2066	165	30,808	18,648%	0	77%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	72,710,495	20,023,026	28%
Future	9,642,794	43,539,540	452%
Lifetime	82,353,290	63,562,566	77%

Attachment 3A
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Lifetime Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	21,376	0	0%	40	0%
	1999	122,011	5,520	5%	154	4%
	2000	269,654	21,501	8%	244	6%
	2001	414,562	384	0%	373	3%
	2002	619,794	341,632	55%	498	25%
	2003	685,542	0	0%	498	17%
	2004	661,587	80,163	12%	467	16%
	2005	636,319	1,098,046	173%	448	42%
	2006	610,693	526,042	86%	422	48%
	2007	588,433	65,611	11%	407	44%
	2008	563,677	458	0%	387	40%
	2009	526,696	150,053	28%	363	39%
	2010	498,056	283,606	57%	351	40%
	2011	471,998	349,644	74%	334	42%
	2012	455,566	138,212	30%	327	42%
	2013	432,548	569,386	132%	307	45%
	2014	391,754	506,215	129%	265	48%
	2015	341,053	82,197	24%	242	48%
	2016	306,246	514,980	168%	226	50%
Projected Future Experience (50 Years)	2017	286,611	510,659	178%	212	53%
	2018	265,471	529,553	199%	198	56%
	2019	244,572	540,093	221%	185	58%
	2020	224,069	539,367	241%	171	61%
	2021	204,115	530,715	260%	157	63%
	2022	184,831	518,814	281%	144	65%
	2023	166,328	504,646	303%	131	67%
	2024	148,710	487,023	327%	119	69%
	2025	132,063	466,724	353%	107	71%
	2026	116,456	442,862	380%	96	73%
	2027	101,939	414,982	407%	85	74%
	2028	88,551	383,462	433%	75	75%
	2029	76,320	349,075	457%	66	77%
	2030	65,255	312,810	479%	57	78%
	2031	55,337	275,485	498%	49	78%
	2032	46,537	240,224	516%	42	79%
	2033	38,790	208,083	536%	36	80%
	2034	32,028	178,164	556%	30	80%
	2035	26,192	151,378	578%	25	80%
	2036	21,224	127,879	603%	21	81%
	2037	17,037	107,185	629%	17	81%
	2038	13,563	89,393	659%	14	81%
	2039	10,713	74,186	692%	12	81%
	2040	8,400	61,556	733%	10	81%
	2041	6,538	51,185	783%	8	82%
	2042	5,047	42,340	839%	6	82%
	2043	3,883	34,978	901%	5	82%
	2044	2,985	28,892	968%	4	82%
	2045	2,277	23,885	1,049%	3	82%
	2046	1,731	19,685	1,137%	3	82%
	2047	1,313	15,947	1,214%	2	82%
	2048	987	12,673	1,284%	2	82%
	2049	741	9,928	1,340%	1	82%
	2050	556	7,685	1,382%	1	82%
	2051	419	5,910	1,412%	1	82%
	2052	316	4,511	1,427%	1	82%
	2053	237	3,356	1,416%	0	82%
	2054	176	2,465	1,399%	0	82%
	2055	129	1,803	1,395%	0	82%
	2056	92	1,312	1,424%	0	82%
	2057-2061	177	2,684	1,515%	0	82%
	2062-2066	22	357	1,635%	0	82%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	13,161,918	6,643,700	50%
Future	1,983,916	5,770,040	291%
Lifetime	15,145,834	12,413,741	82%

Attachment 3B
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Lifetime Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	21,376	0	0%	40	0%
	1999	122,011	5,520	5%	154	4%
	2000	269,654	21,501	8%	244	6%
	2001	414,562	384	0%	373	3%
	2002	619,794	341,632	55%	498	25%
	2003	685,542	0	0%	498	17%
	2004	661,587	80,163	12%	467	16%
	2005	636,319	1,098,046	173%	448	42%
	2006	610,693	526,042	86%	422	48%
	2007	588,433	65,611	11%	407	44%
	2008	563,677	458	0%	387	40%
	2009	526,696	150,053	28%	363	39%
	2010	498,056	283,606	57%	351	40%
	2011	471,998	349,644	74%	334	42%
	2012	455,566	138,212	30%	327	42%
	2013	432,548	569,386	132%	307	45%
	2014	393,897	506,215	129%	265	48%
	2015	381,983	82,197	22%	242	47%
	2016	367,118	514,980	140%	226	50%
Projected Future Experience (50 Years)	2017	350,085	530,930	152%	212	53%
	2018	325,036	550,644	169%	198	55%
	2019	299,710	561,623	187%	185	58%
	2020	274,812	560,871	204%	171	60%
	2021	250,562	551,904	220%	157	62%
	2022	227,109	539,561	238%	144	64%
	2023	204,588	524,850	257%	131	66%
	2024	183,123	506,559	277%	119	68%
	2025	162,821	485,472	298%	107	70%
	2026	143,767	460,702	320%	96	71%
	2027	126,024	431,755	343%	85	73%
	2028	109,641	399,002	364%	75	74%
	2029	94,655	363,265	384%	66	75%
	2030	81,078	325,560	402%	57	76%
	2031	68,891	286,742	416%	49	77%
	2032	58,058	250,062	431%	42	78%
	2033	48,505	216,619	447%	36	78%
	2034	40,149	185,479	462%	30	79%
	2035	32,924	157,596	479%	25	79%
	2036	26,756	133,131	498%	21	79%
	2037	21,546	111,585	518%	17	80%
	2038	17,212	93,060	541%	14	80%
	2039	13,643	77,225	566%	12	80%
	2040	10,739	64,072	597%	10	80%
	2041	8,390	53,272	635%	8	80%
	2042	6,502	44,061	678%	6	80%
	2043	5,023	36,394	725%	5	80%
	2044	3,876	30,058	775%	4	80%
	2045	2,968	24,845	837%	3	80%
	2046	2,265	20,472	904%	3	80%
	2047	1,725	16,582	961%	2	80%
	2048	1,302	13,177	1,012%	2	80%
	2049	980	10,321	1,053%	1	80%
	2050	737	7,988	1,084%	1	80%
	2051	555	6,143	1,106%	1	80%
	2052	420	4,687	1,117%	1	80%
	2053	315	3,487	1,109%	0	80%
	2054	234	2,561	1,095%	0	80%
	2055	172	1,873	1,092%	0	80%
	2056	122	1,363	1,114%	0	80%
	2057-2061	235	2,787	1,184%	0	80%
	2062-2066	29	371	1,275%	0	80%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	13,270,260	6,643,700	50%
Future	2,440,139	6,001,837	246%
Lifetime	15,710,400	12,645,537	80%

Attachment 3D
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Lifetime Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	21,376	0	0%	40	0%
	1999	122,011	5,520	5%	154	4%
	2000	269,654	21,501	8%	244	6%
	2001	414,562	384	0%	373	3%
	2002	619,794	341,632	55%	498	25%
	2003	685,542	0	0%	498	17%
	2004	661,587	80,163	12%	467	16%
	2005	636,319	1,098,046	173%	448	42%
	2006	610,693	526,042	86%	422	48%
	2007	588,433	65,611	11%	407	44%
	2008	563,677	458	0%	387	40%
	2009	526,696	150,053	28%	363	39%
	2010	498,056	283,606	57%	351	40%
	2011	471,998	349,644	74%	334	42%
	2012	455,566	138,212	30%	327	42%
	2013	432,548	569,386	132%	307	45%
	2014	391,754	506,215	129%	265	48%
	2015	341,053	82,197	24%	242	48%
	2016	306,246	514,980	168%	226	50%
Projected Future Experience (50 Years)	2017	286,611	510,659	178%	212	53%
	2018	265,471	529,553	199%	198	56%
	2019	244,572	540,093	221%	185	58%
	2020	224,069	539,367	241%	171	61%
	2021	204,115	530,715	260%	157	63%
	2022	184,831	518,814	281%	144	65%
	2023	166,328	504,646	303%	131	67%
	2024	148,710	487,023	327%	119	69%
	2025	132,063	466,724	353%	107	71%
	2026	116,456	442,862	380%	96	73%
	2027	101,939	414,982	407%	85	74%
	2028	88,551	383,462	433%	75	75%
	2029	76,320	349,075	457%	66	77%
	2030	65,255	312,810	479%	57	78%
	2031	55,337	275,485	498%	49	78%
	2032	46,537	240,224	516%	42	79%
	2033	38,790	208,083	536%	36	80%
	2034	32,028	178,164	556%	30	80%
	2035	26,192	151,378	578%	25	80%
	2036	21,224	127,879	603%	21	81%
	2037	17,037	107,185	629%	17	81%
	2038	13,563	89,393	659%	14	81%
	2039	10,713	74,186	692%	12	81%
	2040	8,400	61,556	733%	10	81%
	2041	6,538	51,185	783%	8	82%
	2042	5,047	42,340	839%	6	82%
	2043	3,883	34,978	901%	5	82%
	2044	2,985	28,892	968%	4	82%
	2045	2,277	23,885	1,049%	3	82%
	2046	1,731	19,685	1,137%	3	82%
	2047	1,313	15,947	1,214%	2	82%
	2048	987	12,673	1,284%	2	82%
	2049	741	9,928	1,340%	1	82%
	2050	556	7,685	1,382%	1	82%
	2051	419	5,910	1,412%	1	82%
	2052	316	4,511	1,427%	1	82%
	2053	237	3,356	1,416%	0	82%
	2054	176	2,465	1,399%	0	82%
	2055	129	1,803	1,395%	0	82%
	2056	92	1,312	1,424%	0	82%
	2057-2061	177	2,684	1,515%	0	82%
	2062-2066	22	357	1,635%	0	82%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	13,161,918	6,643,700	50%
Future	1,983,916	5,770,040	291%
Lifetime	15,145,834	12,413,741	82%

Attachment 3E
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase without RBO, CBUL, and Adverse Selection
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Lifetime Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	21,376	0	0%	40	0%
	1999	122,011	5,520	5%	154	4%
	2000	269,654	21,501	8%	244	6%
	2001	414,562	384	0%	373	3%
	2002	619,794	341,632	55%	498	25%
	2003	685,542	0	0%	498	17%
	2004	661,587	80,163	12%	467	16%
	2005	636,319	1,098,046	173%	448	42%
	2006	610,693	526,042	86%	422	48%
	2007	588,433	65,611	11%	407	44%
	2008	563,677	458	0%	387	40%
	2009	526,696	150,053	28%	363	39%
	2010	498,056	283,606	57%	351	40%
	2011	471,998	349,644	74%	334	42%
	2012	455,566	138,212	30%	327	42%
	2013	432,548	569,386	132%	307	45%
	2014	391,754	506,215	129%	265	48%
	2015	341,053	82,197	24%	242	48%
	2016	306,246	514,980	168%	226	50%
Projected Future Experience (50 Years)	2017	286,611	510,659	178%	212	53%
	2018	265,471	529,553	199%	198	56%
	2019	244,572	540,093	221%	185	58%
	2020	224,069	539,367	241%	171	61%
	2021	204,115	530,715	260%	157	63%
	2022	184,831	518,814	281%	144	65%
	2023	166,328	504,646	303%	131	67%
	2024	148,710	487,023	327%	119	69%
	2025	132,063	466,724	353%	107	71%
	2026	116,456	442,862	380%	96	73%
	2027	101,939	414,982	407%	85	74%
	2028	88,551	383,462	433%	75	75%
	2029	76,320	349,075	457%	66	77%
	2030	65,255	312,810	479%	57	78%
	2031	55,337	275,485	498%	49	78%
	2032	46,537	240,224	516%	42	79%
	2033	38,790	208,083	536%	36	80%
	2034	32,028	178,164	556%	30	80%
	2035	26,192	151,378	578%	25	80%
	2036	21,224	127,879	603%	21	81%
	2037	17,037	107,185	629%	17	81%
	2038	13,563	89,393	659%	14	81%
	2039	10,713	74,186	692%	12	81%
	2040	8,400	61,556	733%	10	81%
	2041	6,538	51,185	783%	8	82%
	2042	5,047	42,340	839%	6	82%
	2043	3,883	34,978	901%	5	82%
	2044	2,985	28,892	968%	4	82%
	2045	2,277	23,885	1,049%	3	82%
	2046	1,731	19,685	1,137%	3	82%
	2047	1,313	15,947	1,214%	2	82%
	2048	987	12,673	1,284%	2	82%
	2049	741	9,928	1,340%	1	82%
	2050	556	7,685	1,382%	1	82%
	2051	419	5,910	1,412%	1	82%
	2052	316	4,511	1,427%	1	82%
	2053	237	3,356	1,416%	0	82%
	2054	176	2,465	1,399%	0	82%
	2055	129	1,803	1,395%	0	82%
	2056	92	1,312	1,424%	0	82%
	2057-2061	177	2,684	1,515%	0	82%
	2062-2066	22	357	1,635%	0	82%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	13,161,918	6,643,700	50%
Future	1,983,916	5,770,040	291%
Lifetime	15,145,834	12,413,741	82%

Attachment 3F
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to Proposed Increase From Inception
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Lifetime Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	21,376	0	0%	40	0%
	1999	122,011	5,520	5%	154	4%
	2000	269,654	21,501	8%	244	6%
	2001	414,562	384	0%	373	3%
	2002	619,794	341,632	55%	498	25%
	2003	685,542	0	0%	498	17%
	2004	661,587	80,163	12%	467	16%
	2005	636,319	1,098,046	173%	448	42%
	2006	610,693	526,042	86%	422	48%
	2007	588,433	65,611	11%	407	44%
	2008	563,677	458	0%	387	40%
	2009	526,696	150,053	28%	363	39%
	2010	498,056	283,606	57%	351	40%
	2011	471,998	349,644	74%	334	42%
	2012	455,566	138,212	30%	327	42%
	2013	432,548	569,386	132%	307	45%
	2014	391,754	506,215	129%	265	48%
	2015	341,053	82,197	24%	242	48%
	2016	306,246	514,980	168%	226	50%
Projected Future Experience (50 Years)	2017	286,611	510,659	178%	212	53%
	2018	265,471	529,553	199%	198	56%
	2019	244,572	540,093	221%	185	58%
	2020	224,069	539,367	241%	171	61%
	2021	204,115	530,715	260%	157	63%
	2022	184,831	518,814	281%	144	65%
	2023	166,328	504,646	303%	131	67%
	2024	148,710	487,023	327%	119	69%
	2025	132,063	466,724	353%	107	71%
	2026	116,456	442,862	380%	96	73%
	2027	101,939	414,982	407%	85	74%
	2028	88,551	383,462	433%	75	75%
	2029	76,320	349,075	457%	66	77%
	2030	65,255	312,810	479%	57	78%
	2031	55,337	275,485	498%	49	78%
	2032	46,537	240,224	516%	42	79%
	2033	38,790	208,083	536%	36	80%
	2034	32,028	178,164	556%	30	80%
	2035	26,192	151,378	578%	25	80%
	2036	21,224	127,879	603%	21	81%
	2037	17,037	107,185	629%	17	81%
	2038	13,563	89,393	659%	14	81%
	2039	10,713	74,186	692%	12	81%
	2040	8,400	61,556	733%	10	81%
	2041	6,538	51,185	783%	8	82%
	2042	5,047	42,340	839%	6	82%
	2043	3,883	34,978	901%	5	82%
	2044	2,985	28,892	968%	4	82%
	2045	2,277	23,885	1,049%	3	82%
	2046	1,731	19,685	1,137%	3	82%
	2047	1,313	15,947	1,214%	2	82%
	2048	987	12,673	1,284%	2	82%
	2049	741	9,928	1,340%	1	82%
	2050	556	7,685	1,382%	1	82%
	2051	419	5,910	1,412%	1	82%
	2052	316	4,511	1,427%	1	82%
	2053	237	3,356	1,416%	0	82%
	2054	176	2,465	1,399%	0	82%
	2055	129	1,803	1,395%	0	82%
	2056	92	1,312	1,424%	0	82%
	2057-2061	177	2,684	1,515%	0	82%
	2062-2066	22	357	1,635%	0	82%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	13,161,918	6,643,700	50%
Future	1,983,916	5,770,040	291%
Lifetime	15,145,834	12,413,741	82%

Attachment 3G
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Expected Experience
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Lifetime Benfit Periods

		Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
	1997	0	0	0%	0	0%
	1998	20,237	6,211	31%	38	31%
	1999	119,350	35,770	30%	153	30%
	2000	264,285	83,807	32%	235	31%
	2001	391,278	128,543	33%	350	32%
	2002	573,047	196,076	34%	460	33%
	2003	621,536	225,719	36%	436	34%
	2004	551,055	224,557	41%	380	35%
	2005	483,625	222,892	46%	336	37%
	2006	429,207	223,233	52%	300	38%
	2007	382,895	224,729	59%	269	40%
	2008	342,227	226,719	66%	242	42%
	2009	305,828	228,639	75%	217	44%
	2010	272,842	230,177	84%	194	45%
	2011	243,074	231,352	95%	174	47%
	2012	216,193	231,965	107%	156	49%
	2013	191,932	231,855	121%	139	51%
	2014	170,008	230,475	136%	124	52%
	2015	150,170	227,766	152%	111	54%
Projected	2016	132,163	223,294	169%	98	55%
Experience	2017	115,869	217,022	187%	87	57%
	2018	101,213	209,670	207%	77	58%
	2019	88,067	201,209	228%	68	60%
	2020	76,272	191,446	251%	60	61%
	2021	65,726	180,396	274%	52	62%
	2022	56,358	168,464	299%	46	63%
	2023	48,049	156,051	325%	39	64%
	2024	40,692	143,088	352%	34	65%
	2025	34,226	129,786	379%	29	65%
	2026	28,586	116,241	407%	25	66%
	2027	23,709	102,875	434%	21	66%
	2028	19,523	90,192	462%	18	67%
	2029	15,961	78,275	490%	15	67%
	2030	12,956	67,231	519%	12	67%
	2031	10,439	57,180	548%	10	68%
	2032	8,354	48,248	578%	8	68%
	2033	6,640	40,426	609%	7	68%
	2034	5,244	33,598	641%	6	68%
	2035	4,118	27,751	674%	5	68%
	2036	3,215	22,821	710%	4	68%
	2037	2,499	18,712	749%	3	68%
	2038	1,935	15,314	791%	2	68%
	2039	1,493	12,505	838%	2	68%
	2040	1,149	10,200	887%	2	68%
	2041	883	8,303	940%	1	68%
	2042	677	6,753	997%	1	68%
	2043	519	5,500	1,060%	1	69%
	2044	398	4,477	1,125%	1	69%
	2045	305	3,643	1,193%	1	69%
	2046	234	2,960	1,265%	0	69%
	2047	179	2,411	1,343%	0	69%
	2048	137	1,964	1,431%	0	69%
	2049	105	1,603	1,522%	0	69%
	2050	82	1,312	1,608%	0	69%
	2051	63	1,070	1,689%	0	69%
	2052	49	872	1,772%	0	69%
	2053	39	717	1,857%	0	69%
	2054	30	588	1,931%	0	69%
	2055	24	481	1,999%	0	69%
	2056	19	392	2,066%	0	69%
	2057-2061	51	1,149	2,262%	0	69%
	2062-2066	17	470	2,822%	0	69%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	9,942,780	5,517,995	55%
Future	610,425	1,716,100	281%
Lifetime	10,553,205	7,234,095	69%

Attachment 3H
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with No Inflation Protection and Lifetime Benfit Periods

		Actual or Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	21,376	0	0%	40	0%
	1999	122,011	5,520	5%	154	4%
	2000	269,654	21,501	8%	244	6%
	2001	414,562	384	0%	373	3%
	2002	619,794	341,632	55%	498	24%
	2003	685,542	0	0%	498	17%
	2004	661,587	80,163	12%	467	16%
	2005	636,319	1,098,046	173%	448	42%
	2006	610,693	526,042	86%	422	48%
	2007	588,433	65,611	11%	407	44%
	2008	563,677	458	0%	387	40%
	2009	526,696	150,053	28%	363	39%
	2010	498,056	283,606	57%	351	40%
	2011	471,998	349,644	74%	334	42%
	2012	455,566	138,212	30%	327	41%
	2013	432,548	569,386	132%	307	45%
	2014	391,754	506,215	129%	265	48%
	2015	341,053	82,197	24%	242	47%
	2016	306,246	514,980	168%	226	50%
Projected Future Experience (50 Years)	2017	277,656	507,421	183%	199	53%
	2018	240,953	486,649	202%	175	55%
	2019	208,152	462,735	222%	153	57%
	2020	178,870	435,300	243%	133	59%
	2021	152,803	405,389	265%	115	61%
	2022	129,793	374,651	289%	99	62%
	2023	109,522	342,952	313%	85	64%
	2024	91,739	310,232	338%	72	65%
	2025	76,265	277,266	364%	61	66%
	2026	62,916	244,513	389%	51	67%
	2027	51,502	212,986	414%	43	67%
	2028	41,828	183,269	438%	35	68%
	2029	33,702	156,019	463%	29	68%
	2030	26,937	131,653	489%	24	69%
	2031	21,346	109,953	515%	19	69%
	2032	16,782	90,970	542%	15	69%
	2033	13,099	74,646	570%	12	69%
	2034	10,148	60,793	599%	10	70%
	2035	7,806	49,206	630%	8	70%
	2036	5,962	39,658	665%	6	70%
	2037	4,529	31,836	703%	5	70%
	2038	3,422	25,508	745%	4	70%
	2039	2,573	20,400	793%	3	70%
	2040	1,930	16,316	845%	2	70%
	2041	1,440	13,013	904%	2	70%
	2042	1,068	10,299	964%	1	70%
	2043	792	8,125	1,026%	1	70%
	2044	588	6,386	1,086%	1	70%
	2045	434	4,990	1,149%	1	70%
	2046	318	3,868	1,217%	0	70%
	2047	232	2,970	1,281%	0	70%
	2048	167	2,249	1,347%	0	70%
	2049	119	1,681	1,407%	0	70%
	2050	85	1,243	1,458%	0	70%
	2051	61	914	1,499%	0	70%
	2052	44	667	1,534%	0	70%
	2053	31	479	1,567%	0	70%
	2054	21	340	1,597%	0	70%
	2055	15	238	1,629%	0	70%
	2056	10	163	1,665%	0	70%
	2057-2061	17	287	1,711%	0	70%
	2062-2066	2	28	1,741%	0	70%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	13,812,833	6,908,571	50%
Future	1,412,037	3,762,265	266%
Lifetime	15,224,870	10,670,836	70%

Attachment 4A
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	91	0	0%	2	0%
	1998	32,881	0	0%	56	0%
	1999	174,405	0	0%	237	0%
	2000	514,390	384	0%	452	0%
	2001	862,545	0	0%	733	0%
	2002	1,197,903	0	0%	920	0%
	2003	1,287,431	147,038	11%	889	3%
	2004	1,223,790	292,957	24%	826	8%
	2005	1,157,790	653,009	56%	790	16%
	2006	1,106,032	349,465	32%	756	18%
	2007	1,069,354	122,815	11%	737	17%
	2008	1,043,552	12,937	1%	712	16%
	2009	992,981	612,623	62%	671	19%
	2010	952,183	605,299	64%	656	22%
	2011	925,302	940,376	102%	642	27%
	2012	896,021	482,980	54%	624	28%
	2013	870,838	1,106,860	127%	611	32%
	2014	837,643	1,259,663	150%	577	37%
	2015	788,224	132,539	17%	549	36%
	2016	755,820	783,734	104%	531	38%
Projected Future Experience (50 Years)	2017	723,435	1,044,432	144%	511	41%
	2018	690,594	1,170,283	169%	490	44%
	2019	657,358	1,294,427	197%	469	48%
	2020	623,864	1,415,252	227%	448	51%
	2021	590,244	1,534,960	260%	427	55%
	2022	556,620	1,659,157	298%	406	58%
	2023	523,105	1,789,110	342%	385	62%
	2024	489,822	1,924,087	393%	364	66%
	2025	456,896	2,064,257	452%	343	70%
	2026	424,458	2,200,458	518%	322	75%
	2027	392,662	2,324,338	592%	302	79%
	2028	361,686	2,434,392	673%	281	83%
	2029	331,710	2,525,489	761%	262	87%
	2030	302,908	2,594,220	856%	242	91%
	2031	275,424	2,644,982	960%	224	96%
	2032	249,333	2,696,255	1,081%	206	100%
	2033	224,659	2,753,755	1,226%	189	103%
	2034	201,458	2,800,263	1,390%	172	107%
	2035	179,791	2,826,196	1,572%	157	111%
	2036	159,689	2,831,341	1,773%	142	115%
	2037	141,141	2,815,239	1,995%	128	118%
	2038	124,121	2,777,949	2,238%	115	121%
	2039	108,591	2,724,651	2,509%	102	124%
	2040	94,505	2,647,114	2,801%	91	127%
	2041	81,813	2,549,449	3,116%	80	130%
	2042	70,431	2,433,961	3,456%	70	132%
	2043	60,290	2,301,985	3,818%	62	134%
	2044	51,310	2,161,908	4,213%	54	136%
	2045	43,411	2,011,281	4,633%	46	138%
	2046	36,519	1,857,484	5,086%	40	140%
	2047	30,562	1,703,307	5,573%	34	141%
	2048	25,427	1,550,055	6,096%	29	142%
	2049	21,040	1,400,901	6,658%	25	143%
	2050	17,336	1,257,042	7,251%	21	144%
	2051	14,203	1,118,142	7,873%	17	145%
	2052	11,583	985,148	8,505%	14	146%
	2053	9,406	861,119	9,155%	12	146%
	2054	7,602	746,778	9,824%	10	146%
	2055	6,119	644,873	10,540%	8	147%
	2056	4,907	555,499	11,320%	7	147%
	2057-2061	12,997	1,742,404	13,406%	18	148%
	2062-2066	4,021	703,658	17,498%	6	148%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	25,246,652	9,703,490	38%
Future	6,505,611	37,381,963	575%
Lifetime	31,752,263	47,085,453	148%

Attachment 4B
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	91	0	0%	2	0%
	1998	32,881	0	0%	56	0%
	1999	174,405	0	0%	237	0%
	2000	514,390	384	0%	452	0%
	2001	862,545	0	0%	733	0%
	2002	1,197,903	0	0%	920	0%
	2003	1,287,431	147,038	11%	889	3%
	2004	1,223,790	292,957	24%	826	8%
	2005	1,157,790	653,009	56%	790	16%
	2006	1,106,032	349,465	32%	756	18%
	2007	1,069,354	122,815	11%	737	17%
	2008	1,043,552	12,937	1%	712	16%
	2009	992,981	612,623	62%	671	19%
	2010	952,183	605,299	64%	656	22%
	2011	925,302	940,376	102%	642	27%
	2012	896,021	482,980	54%	624	28%
	2013	870,838	1,106,860	127%	611	32%
	2014	841,671	1,259,663	150%	577	37%
	2015	864,281	132,539	15%	549	36%
	2016	904,067	783,734	87%	531	38%
Projected Future Experience (50 Years)	2017	898,430	1,088,756	121%	511	41%
	2018	874,572	1,220,555	140%	490	44%
	2019	845,716	1,349,586	160%	469	47%
	2020	804,764	1,474,656	183%	448	50%
	2021	761,579	1,598,301	210%	427	54%
	2022	718,388	1,726,417	240%	406	57%
	2023	675,337	1,860,393	275%	385	61%
	2024	632,581	1,999,466	316%	364	65%
	2025	590,279	2,143,783	363%	343	68%
	2026	548,599	2,283,837	416%	322	72%
	2027	507,736	2,411,024	475%	302	77%
	2028	467,916	2,523,859	539%	281	81%
	2029	429,371	2,617,051	610%	262	85%
	2030	392,319	2,687,096	685%	242	89%
	2031	356,943	2,738,546	767%	224	93%
	2032	323,339	2,790,613	863%	206	96%
	2033	291,536	2,849,213	977%	189	100%
	2034	261,604	2,896,518	1,107%	172	104%
	2035	233,624	2,922,586	1,251%	157	107%
	2036	207,635	2,927,181	1,410%	142	111%
	2037	183,626	2,909,926	1,585%	128	114%
	2038	161,570	2,870,791	1,777%	115	117%
	2039	141,419	2,815,146	1,991%	102	120%
	2040	123,123	2,734,574	2,221%	91	123%
	2041	106,620	2,633,274	2,470%	80	125%
	2042	91,808	2,513,685	2,738%	70	128%
	2043	78,604	2,377,083	3,024%	62	130%
	2044	66,906	2,232,151	3,336%	54	132%
	2045	56,610	2,076,407	3,668%	46	133%
	2046	47,623	1,917,436	4,026%	40	135%
	2047	39,852	1,758,189	4,412%	34	136%
	2048	33,157	1,599,921	4,825%	29	137%
	2049	27,436	1,445,868	5,270%	25	138%
	2050	22,605	1,297,277	5,739%	21	139%
	2051	18,518	1,153,832	6,231%	17	140%
	2052	15,100	1,016,539	6,732%	14	140%
	2053	12,258	888,504	7,248%	12	141%
	2054	9,902	770,444	7,781%	10	141%
	2055	7,966	665,214	8,350%	8	142%
	2056	6,385	572,928	8,973%	7	142%
	2057-2061	16,846	1,795,779	10,660%	18	143%
	2062-2066	5,133	723,873	14,103%	6	143%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	25,483,941	9,703,490	38%
Future	8,355,640	38,740,352	464%
Lifetime	33,839,582	48,443,841	143%

Attachment 4D
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	91	0	0%	2	0%
	1998	32,881	0	0%	56	0%
	1999	174,405	0	0%	237	0%
	2000	514,390	384	0%	452	0%
	2001	862,545	0	0%	733	0%
	2002	1,197,903	0	0%	920	0%
	2003	1,287,431	147,038	11%	889	3%
	2004	1,223,790	292,957	24%	826	8%
	2005	1,157,790	653,009	56%	790	16%
	2006	1,106,032	349,465	32%	756	18%
	2007	1,069,354	122,815	11%	737	17%
	2008	1,043,552	12,937	1%	712	16%
	2009	992,981	612,623	62%	671	19%
	2010	952,183	605,299	64%	656	22%
	2011	925,302	940,376	102%	642	27%
	2012	896,021	482,980	54%	624	28%
	2013	870,838	1,106,860	127%	611	32%
	2014	837,643	1,259,663	150%	577	37%
	2015	788,224	132,539	17%	549	36%
	2016	755,820	783,734	104%	531	38%
Projected Future Experience (50 Years)	2017	723,435	1,044,432	144%	511	41%
	2018	768,041	1,154,111	150%	465	44%
	2019	1,154,756	1,174,300	102%	422	46%
	2020	1,169,745	1,259,987	108%	403	49%
	2021	1,106,708	1,362,867	123%	384	51%
	2022	1,043,662	1,469,055	141%	365	53%
	2023	980,823	1,579,827	161%	346	56%
	2024	918,417	1,694,671	185%	327	58%
	2025	856,680	1,813,741	212%	309	61%
	2026	795,859	1,928,962	242%	290	64%
	2027	736,242	2,033,084	276%	271	67%
	2028	678,161	2,124,966	313%	253	70%
	2029	621,957	2,200,231	354%	236	73%
	2030	567,952	2,256,024	397%	218	76%
	2031	516,420	2,296,267	445%	202	79%
	2032	467,499	2,337,060	500%	185	82%
	2033	421,236	2,383,418	566%	170	85%
	2034	377,733	2,420,441	641%	155	87%
	2035	337,109	2,439,896	724%	141	90%
	2036	299,417	2,441,632	815%	128	93%
	2037	264,639	2,425,284	916%	115	95%
	2038	232,727	2,390,927	1,027%	103	97%
	2039	203,608	2,343,054	1,151%	92	100%
	2040	177,197	2,274,622	1,284%	82	102%
	2041	153,400	2,189,166	1,427%	72	104%
	2042	132,057	2,088,649	1,582%	63	105%
	2043	113,044	1,974,211	1,746%	55	107%
	2044	96,207	1,853,047	1,926%	48	108%
	2045	81,395	1,723,072	2,117%	42	110%
	2046	68,473	1,590,588	2,323%	36	111%
	2047	57,303	1,457,957	2,544%	31	112%
	2048	47,676	1,326,271	2,782%	26	113%
	2049	39,451	1,198,229	3,037%	22	113%
	2050	32,506	1,074,846	3,307%	19	114%
	2051	26,631	955,810	3,589%	16	115%
	2052	21,718	841,911	3,876%	13	115%
	2053	17,637	735,747	4,172%	11	116%
	2054	14,253	637,921	4,476%	9	116%
	2055	11,472	550,768	4,801%	7	116%
	2056	9,201	474,356	5,155%	6	116%
	2057-2061	24,370	1,487,354	6,103%	16	117%
	2062-2066	7,540	600,388	7,963%	5	117%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	25,246,652	9,703,490	38%
Future	11,015,948	32,788,314	298%
Lifetime	36,262,600	42,491,804	117%

Attachment 4E
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase without RBO, CBUL, and Adverse Selection
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	91	0	0%	2	0%
	1998	32,881	0	0%	56	0%
	1999	174,405	0	0%	237	0%
	2000	514,390	384	0%	452	0%
	2001	862,545	0	0%	733	0%
	2002	1,197,903	0	0%	920	0%
	2003	1,287,431	147,038	11%	889	3%
	2004	1,223,790	292,957	24%	826	8%
	2005	1,157,790	653,009	56%	790	16%
	2006	1,106,032	349,465	32%	756	18%
	2007	1,069,354	122,815	11%	737	17%
	2008	1,043,552	12,937	1%	712	16%
	2009	992,981	612,623	62%	671	19%
	2010	952,183	605,299	64%	656	22%
	2011	925,302	940,376	102%	642	27%
	2012	896,021	482,980	54%	624	28%
	2013	870,838	1,106,860	127%	611	32%
	2014	837,643	1,259,663	150%	577	37%
	2015	788,224	132,539	17%	549	36%
	2016	755,820	783,734	104%	531	38%
Projected Future Experience (50 Years)	2017	723,435	1,044,432	144%	511	41%
	2018	805,658	1,177,721	146%	490	44%
	2019	1,396,349	1,347,405	96%	469	47%
	2020	1,434,887	1,479,028	103%	448	49%
	2021	1,357,562	1,599,793	118%	427	52%
	2022	1,280,225	1,724,441	135%	406	54%
	2023	1,203,142	1,854,470	154%	385	57%
	2024	1,126,591	1,989,279	177%	364	60%
	2025	1,050,860	2,129,049	203%	343	63%
	2026	976,253	2,264,300	232%	322	66%
	2027	903,123	2,386,523	264%	302	69%
	2028	831,877	2,494,378	300%	281	73%
	2029	762,934	2,582,727	339%	262	76%
	2030	696,688	2,648,220	380%	242	79%
	2031	633,476	2,695,459	426%	224	82%
	2032	573,466	2,743,344	478%	206	85%
	2033	516,716	2,797,760	541%	189	88%
	2034	463,353	2,841,219	613%	172	91%
	2035	413,520	2,864,057	693%	157	94%
	2036	367,285	2,866,095	780%	142	97%
	2037	324,624	2,846,904	877%	128	100%
	2038	285,478	2,806,575	983%	115	103%
	2039	249,759	2,750,379	1,101%	102	105%
	2040	217,362	2,670,051	1,228%	91	107%
	2041	188,170	2,569,739	1,366%	80	109%
	2042	161,990	2,451,748	1,514%	70	111%
	2043	138,667	2,317,415	1,671%	62	113%
	2044	118,014	2,175,188	1,843%	54	115%
	2045	99,845	2,022,618	2,026%	46	116%
	2046	83,994	1,867,102	2,223%	40	117%
	2047	70,292	1,711,413	2,435%	34	118%
	2048	58,483	1,556,834	2,662%	29	119%
	2049	48,393	1,406,534	2,906%	25	120%
	2050	39,874	1,261,701	3,164%	21	121%
	2051	32,667	1,121,972	3,435%	17	122%
	2052	26,641	988,272	3,710%	14	122%
	2053	21,634	863,652	3,992%	12	123%
	2054	17,483	748,819	4,283%	10	123%
	2055	14,073	646,515	4,594%	8	123%
	2056	11,287	556,820	4,933%	7	123%
	2057-2061	29,894	1,745,921	5,840%	18	124%
	2062-2066	9,249	704,761	7,620%	6	124%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	25,246,652	9,703,490	38%
Future	13,206,683	38,117,222	289%
Lifetime	38,453,335	47,820,711	124%

Attachment 4F
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to Proposed Increase From Inception
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	210	0	0%	2	0%
	1998	75,627	0	0%	56	0%
	1999	401,132	0	0%	237	0%
	2000	1,183,096	384	0%	452	0%
	2001	1,983,854	0	0%	733	0%
	2002	2,755,177	0	0%	920	0%
	2003	2,961,092	147,038	5%	889	1%
	2004	2,814,718	292,957	10%	826	3%
	2005	2,662,916	653,009	25%	790	7%
	2006	2,543,874	349,465	14%	756	8%
	2007	2,459,514	122,815	5%	737	7%
	2008	2,400,169	12,937	1%	712	7%
	2009	2,283,856	612,623	27%	671	8%
	2010	2,190,021	605,299	28%	656	10%
	2011	2,128,194	940,376	44%	642	12%
	2012	2,060,848	482,980	23%	624	12%
	2013	2,002,927	1,106,860	55%	611	14%
	2014	1,926,578	1,259,663	65%	577	16%
	2015	1,812,915	132,539	7%	549	16%
	2016	1,738,387	783,734	45%	531	17%
Projected Future Experience (50 Years)	2017	1,663,902	1,138,790	68%	511	18%
	2018	1,588,365	1,272,583	80%	490	20%
	2019	1,511,923	1,403,840	93%	469	21%
	2020	1,434,887	1,530,794	107%	448	23%
	2021	1,357,562	1,655,786	122%	427	25%
	2022	1,280,225	1,784,796	139%	406	26%
	2023	1,203,142	1,919,376	160%	385	28%
	2024	1,126,591	2,058,904	183%	364	30%
	2025	1,050,860	2,203,565	210%	343	32%
	2026	976,253	2,343,550	240%	322	34%
	2027	903,123	2,470,051	274%	302	36%
	2028	831,877	2,581,681	310%	281	38%
	2029	762,933	2,673,123	350%	262	40%
	2030	696,688	2,740,907	393%	242	42%
	2031	633,476	2,789,800	440%	224	43%
	2032	573,466	2,839,361	495%	206	45%
	2033	516,716	2,895,682	560%	189	47%
	2034	463,353	2,940,662	635%	172	49%
	2035	413,520	2,964,299	717%	157	51%
	2036	367,285	2,966,408	808%	142	52%
	2037	324,624	2,946,546	908%	128	54%
	2038	285,478	2,904,805	1,018%	115	55%
	2039	249,759	2,846,642	1,140%	102	57%
	2040	217,362	2,763,503	1,271%	91	58%
	2041	188,170	2,659,680	1,413%	80	59%
	2042	161,990	2,537,559	1,566%	70	60%
	2043	138,667	2,398,524	1,730%	62	61%
	2044	118,014	2,251,319	1,908%	54	62%
	2045	99,845	2,093,409	2,097%	46	63%
	2046	83,994	1,932,450	2,301%	40	64%
	2047	70,292	1,771,313	2,520%	34	64%
	2048	58,483	1,611,324	2,755%	29	65%
	2049	48,393	1,455,762	3,008%	25	65%
	2050	39,874	1,305,860	3,275%	21	66%
	2051	32,667	1,161,241	3,555%	17	66%
	2052	26,641	1,022,861	3,839%	14	66%
	2053	21,634	893,879	4,132%	12	66%
	2054	17,483	775,028	4,433%	10	67%
	2055	14,073	669,144	4,755%	8	67%
	2056	11,287	576,309	5,106%	7	67%
	2057-2061	29,894	1,807,028	6,045%	18	67%
	2062-2066	9,249	729,428	7,886%	6	67%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	58,067,297	9,703,490	17%
Future	14,962,905	39,566,392	264%
Lifetime	73,030,202	49,269,881	67%

Attachment 4G
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Expected Experience
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
	1997	81	10	12%	2	12%
	1998	31,584	4,679	15%	56	15%
	1999	172,368	27,589	16%	240	16%
	2000	525,322	87,959	17%	459	16%
	2001	872,644	149,449	17%	745	17%
	2002	1,231,299	215,082	17%	972	17%
	2003	1,320,085	250,589	19%	920	18%
	2004	1,178,661	258,603	22%	800	19%
	2005	1,033,918	265,494	26%	708	20%
	2006	919,757	276,516	30%	633	21%
	2007	823,740	290,601	35%	569	22%
	2008	739,559	306,937	42%	511	23%
	2009	664,517	325,272	49%	460	25%
	2010	597,497	345,348	58%	415	26%
	2011	537,460	367,106	68%	375	28%
	2012	483,621	390,460	81%	338	29%
	2013	435,380	415,040	95%	306	31%
	2014	392,126	440,121	112%	277	33%
	2015	353,164	465,432	132%	251	35%
Projected	2016	318,055	490,547	154%	228	36%
Experience	2017	286,467	514,985	180%	208	38%
	2018	258,042	539,329	209%	189	40%
	2019	232,427	563,228	242%	172	42%
	2020	209,326	586,082	280%	157	44%
	2021	188,398	607,404	322%	144	46%
	2022	169,358	626,140	370%	131	48%
	2023	151,857	641,815	423%	119	50%
	2024	135,669	653,365	482%	108	51%
	2025	120,742	660,774	547%	98	53%
	2026	107,039	663,746	620%	88	55%
	2027	94,522	662,162	701%	80	56%
	2028	83,143	657,273	791%	71	58%
	2029	72,849	648,968	891%	64	59%
	2030	63,584	637,004	1,002%	57	61%
	2031	55,290	622,015	1,125%	51	62%
	2032	47,904	604,184	1,261%	45	63%
	2033	41,361	584,381	1,413%	40	64%
	2034	35,592	562,596	1,581%	35	65%
	2035	30,530	538,495	1,764%	31	66%
	2036	26,108	512,589	1,963%	27	67%
	2037	22,264	485,458	2,181%	24	68%
	2038	18,934	457,539	2,417%	21	68%
	2039	16,060	428,975	2,671%	18	69%
	2040	13,593	399,838	2,942%	16	69%
	2041	11,481	371,472	3,236%	13	70%
	2042	9,678	343,826	3,553%	12	70%
	2043	8,144	317,206	3,895%	10	71%
	2044	6,845	291,759	4,263%	9	71%
	2045	5,747	267,338	4,652%	7	71%
	2046	4,821	244,215	5,065%	6	72%
	2047	4,044	222,444	5,501%	5	72%
	2048	3,391	202,283	5,965%	5	72%
	2049	2,844	183,527	6,454%	4	72%
	2050	2,386	166,182	6,964%	3	72%
	2051	2,003	150,331	7,506%	3	72%
	2052	1,681	135,822	8,079%	2	73%
	2053	1,412	122,679	8,691%	2	73%
	2054	1,185	110,719	9,340%	2	73%
	2055	996	100,109	10,054%	1	73%
	2056	836	90,594	10,838%	1	73%
	2057-2061	2,531	339,841	13,428%	4	73%
	2062-2066	993	204,076	20,548%	1	73%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	21,260,180	7,744,002	36%
Future	1,858,384	9,153,345	493%
Lifetime	23,118,564	16,897,347	73%

Attachment 4H
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued Prior to October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	91	0	0%	2	0%
	1998	32,881	0	0%	56	0%
	1999	174,405	0	0%	237	0%
	2000	514,390	384	0%	452	0%
	2001	862,545	0	0%	733	0%
	2002	1,197,903	0	0%	920	0%
	2003	1,287,431	147,038	11%	889	3%
	2004	1,223,790	292,957	24%	826	8%
	2005	1,157,790	653,009	56%	790	16%
	2006	1,106,032	349,465	32%	756	18%
	2007	1,069,354	122,815	11%	737	17%
	2008	1,043,552	12,937	1%	712	16%
	2009	992,981	612,623	62%	671	19%
	2010	952,183	605,299	64%	656	22%
	2011	925,302	940,376	102%	642	26%
	2012	896,021	482,980	54%	624	28%
	2013	870,838	1,106,860	127%	611	32%
	2014	837,643	1,259,663	150%	577	36%
	2015	788,224	132,539	17%	549	36%
	2016	755,820	783,734	104%	531	38%
Projected Future Experience (50 Years)	2017	702,202	1,371,731	195%	481	42%
	2018	630,934	1,430,898	227%	436	46%
	2019	566,497	1,487,097	263%	396	49%
	2020	508,259	1,539,230	303%	359	53%
	2021	455,326	1,585,046	348%	325	57%
	2022	407,091	1,621,979	398%	295	61%
	2023	362,827	1,649,048	455%	266	64%
	2024	322,018	1,664,405	517%	240	68%
	2025	284,533	1,668,394	586%	215	71%
	2026	250,286	1,660,661	664%	192	74%
	2027	219,169	1,641,185	749%	171	77%
	2028	191,051	1,614,126	845%	152	80%
	2029	165,786	1,579,707	953%	134	82%
	2030	143,212	1,536,781	1,073%	118	85%
	2031	123,160	1,488,501	1,209%	103	87%
	2032	105,452	1,435,536	1,361%	90	89%
	2033	89,899	1,378,413	1,533%	79	91%
	2034	76,310	1,318,643	1,728%	68	92%
	2035	64,498	1,252,408	1,942%	59	94%
	2036	54,282	1,180,965	2,176%	51	95%
	2037	45,490	1,106,671	2,433%	43	97%
	2038	37,956	1,029,544	2,712%	37	98%
	2039	31,528	951,877	3,019%	31	99%
	2040	26,070	873,118	3,349%	26	100%
	2041	21,461	796,097	3,710%	22	100%
	2042	17,582	721,222	4,102%	19	101%
	2043	14,335	648,591	4,525%	16	102%
	2044	11,633	579,758	4,984%	13	102%
	2045	9,399	514,840	5,478%	11	103%
	2046	7,562	454,103	6,005%	9	103%
	2047	6,061	398,162	6,569%	7	103%
	2048	4,839	347,019	7,171%	6	103%
	2049	3,849	300,220	7,799%	5	104%
	2050	3,055	258,513	8,463%	4	104%
	2051	2,416	221,553	9,169%	3	104%
	2052	1,905	188,674	9,903%	2	104%
	2053	1,500	159,840	10,658%	2	104%
	2054	1,178	134,530	11,418%	2	104%
	2055	924	112,732	12,197%	1	104%
	2056	724	94,222	13,013%	1	104%
	2057-2061	1,824	276,988	15,185%	3	104%
	2062-2066	515	104,815	20,341%	1	104%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	26,471,142	9,994,259	38%
Future	4,422,994	22,257,883	503%
Lifetime	30,894,136	32,252,141	104%

Attachment 5A
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Limited Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	9,204	0	0%	84	0%
	2004	139,577	0	0%	246	0%
	2005	279,772	0	0%	511	0%
	2006	568,551	0	0%	668	0%
	2007	650,615	32,744	5%	669	2%
	2008	629,849	0	0%	619	1%
	2009	578,185	258,871	45%	558	9%
	2010	531,258	115,552	22%	511	11%
	2011	488,285	3,054	1%	482	10%
	2012	460,901	104,261	23%	456	11%
	2013	430,402	94,600	22%	436	12%
	2014	389,152	199,116	51%	369	14%
	2015	336,501	63,364	19%	338	15%
	2016	311,309	204,186	66%	325	17%
Projected Future Experience (50 Years)	2017	297,637	178,016	60%	311	18%
	2018	283,085	193,644	68%	297	20%
	2019	268,244	212,378	79%	283	22%
	2020	253,106	233,105	92%	269	23%
	2021	237,723	253,795	107%	254	25%
	2022	222,156	272,294	123%	239	27%
	2023	206,510	288,546	140%	224	29%
	2024	190,908	298,632	156%	209	31%
	2025	175,472	303,829	173%	194	33%
	2026	160,306	305,432	191%	179	34%
	2027	145,504	305,355	210%	164	36%
	2028	131,173	303,557	231%	150	38%
	2029	117,425	300,776	256%	136	39%
	2030	104,357	294,618	282%	122	41%
	2031	92,053	285,151	310%	109	42%
	2032	80,559	274,681	341%	97	43%
	2033	69,905	262,385	375%	86	44%
	2034	60,138	246,452	410%	75	45%
	2035	51,295	228,516	445%	65	46%
	2036	43,382	208,619	481%	56	47%
	2037	36,377	188,616	518%	48	48%
	2038	30,241	168,773	558%	41	48%
	2039	24,930	149,941	601%	34	49%
	2040	20,384	131,971	647%	29	49%
	2041	16,528	114,649	694%	24	50%
	2042	13,289	98,558	742%	20	50%
	2043	10,590	83,951	793%	16	50%
	2044	8,364	70,758	846%	13	51%
	2045	6,544	58,741	898%	10	51%
	2046	5,070	47,885	944%	8	51%
	2047	3,886	38,578	993%	7	51%
	2048	2,949	30,678	1,040%	5	51%
	2049	2,211	23,851	1,079%	4	51%
	2050	1,635	18,221	1,115%	3	51%
	2051	1,196	13,691	1,145%	2	51%
	2052	863	10,130	1,173%	2	51%
	2053	616	7,403	1,201%	1	51%
	2054	436	5,338	1,225%	1	51%
	2055	305	3,814	1,250%	1	51%
	2056	212	2,696	1,274%	1	51%
	2057-2061	386	5,220	1,353%	1	51%
	2062-2066	52	871	1,678%	0	51%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	7,759,395	1,297,412	17%
Future	2,489,441	3,958,370	159%
Lifetime	10,248,836	5,255,782	51%

Attachment 5B
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Limited Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	9,204	0	0%	84	0%
	2004	139,577	0	0%	246	0%
	2005	279,772	0	0%	511	0%
	2006	568,551	0	0%	668	0%
	2007	650,615	32,744	5%	669	2%
	2008	629,849	0	0%	619	1%
	2009	578,185	258,871	45%	558	9%
	2010	531,258	115,552	22%	511	11%
	2011	488,285	3,054	1%	482	10%
	2012	460,901	104,261	23%	456	11%
	2013	430,402	94,600	22%	436	12%
	2014	394,095	199,116	51%	369	14%
	2015	381,926	63,364	17%	338	15%
	2016	380,213	204,186	54%	325	16%
Projected Future Experience (50 Years)	2017	367,014	185,741	51%	311	18%
	2018	349,078	202,000	58%	297	19%
	2019	330,696	221,491	67%	283	21%
	2020	311,952	243,062	78%	269	23%
	2021	292,912	264,585	90%	254	24%
	2022	273,657	283,816	104%	239	26%
	2023	254,318	300,696	118%	224	28%
	2024	235,043	311,152	132%	209	30%
	2025	215,985	316,506	147%	194	32%
	2026	197,273	318,112	161%	179	33%
	2027	179,022	317,972	178%	164	35%
	2028	161,363	316,039	196%	150	36%
	2029	144,435	313,079	217%	136	38%
	2030	128,352	306,607	239%	122	39%
	2031	113,218	296,696	262%	109	41%
	2032	99,085	285,745	288%	97	42%
	2033	85,989	272,900	317%	86	43%
	2034	73,986	256,280	346%	75	44%
	2035	63,119	237,583	376%	65	45%
	2036	53,394	216,854	406%	56	46%
	2037	44,783	196,022	438%	48	46%
	2038	37,237	175,362	471%	41	47%
	2039	30,704	155,763	507%	34	47%
	2040	25,111	137,069	546%	29	48%
	2041	20,364	119,056	585%	24	48%
	2042	16,376	102,326	625%	20	48%
	2043	13,051	87,145	668%	16	49%
	2044	10,308	73,439	712%	13	49%
	2045	8,066	60,960	756%	10	49%
	2046	6,249	49,689	795%	8	49%
	2047	4,789	40,028	836%	7	49%
	2048	3,634	31,828	876%	5	49%
	2049	2,723	24,743	909%	4	49%
	2050	2,013	18,901	939%	3	49%
	2051	1,472	14,201	965%	2	49%
	2052	1,062	10,507	989%	2	49%
	2053	758	7,678	1,013%	1	49%
	2054	535	5,537	1,034%	1	49%
	2055	374	3,955	1,056%	1	49%
	2056	260	2,796	1,077%	1	49%
	2057-2061	472	5,412	1,146%	1	49%
	2062-2066	63	903	1,424%	0	49%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	7,883,640	1,297,412	16%
Future	3,066,269	4,121,692	134%
Lifetime	10,949,909	5,419,104	49%

Attachment 5D
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Limited Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	9,204	0	0%	84	0%
	2004	139,577	0	0%	246	0%
	2005	279,772	0	0%	511	0%
	2006	568,551	0	0%	668	0%
	2007	650,615	32,744	5%	669	2%
	2008	629,849	0	0%	619	1%
	2009	578,185	258,871	45%	558	9%
	2010	531,258	115,552	22%	511	11%
	2011	488,285	3,054	1%	482	10%
	2012	460,901	104,261	23%	456	11%
	2013	430,402	94,600	22%	436	12%
	2014	389,152	199,116	51%	369	14%
	2015	336,501	63,364	19%	338	15%
	2016	311,309	204,186	66%	325	17%
Projected Future Experience (50 Years)	2017	297,637	178,016	60%	311	18%
	2018	283,085	193,644	68%	297	20%
	2019	268,244	212,378	79%	283	22%
	2020	253,106	233,105	92%	269	23%
	2021	237,723	253,795	107%	254	25%
	2022	222,156	272,294	123%	239	27%
	2023	206,510	288,546	140%	224	29%
	2024	190,908	298,632	156%	209	31%
	2025	175,472	303,829	173%	194	33%
	2026	160,306	305,432	191%	179	34%
	2027	145,504	305,355	210%	164	36%
	2028	131,173	303,557	231%	150	38%
	2029	117,425	300,776	256%	136	39%
	2030	104,357	294,618	282%	122	41%
	2031	92,053	285,151	310%	109	42%
	2032	80,559	274,681	341%	97	43%
	2033	69,905	262,385	375%	86	44%
	2034	60,138	246,452	410%	75	45%
	2035	51,295	228,516	445%	65	46%
	2036	43,382	208,619	481%	56	47%
	2037	36,377	188,616	518%	48	48%
	2038	30,241	168,773	558%	41	48%
	2039	24,930	149,941	601%	34	49%
	2040	20,384	131,971	647%	29	49%
	2041	16,528	114,649	694%	24	50%
	2042	13,289	98,558	742%	20	50%
	2043	10,590	83,951	793%	16	50%
	2044	8,364	70,758	846%	13	51%
	2045	6,544	58,741	898%	10	51%
	2046	5,070	47,885	944%	8	51%
	2047	3,886	38,578	993%	7	51%
	2048	2,949	30,678	1,040%	5	51%
	2049	2,211	23,851	1,079%	4	51%
	2050	1,635	18,221	1,115%	3	51%
	2051	1,196	13,691	1,145%	2	51%
	2052	863	10,130	1,173%	2	51%
	2053	616	7,403	1,201%	1	51%
	2054	436	5,338	1,225%	1	51%
	2055	305	3,814	1,250%	1	51%
	2056	212	2,696	1,274%	1	51%
	2057-2061	386	5,220	1,353%	1	51%
	2062-2066	52	871	1,678%	0	51%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	7,759,395	1,297,412	17%
Future	2,489,441	3,958,370	159%
Lifetime	10,248,836	5,255,782	51%

Attachment 5E
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase without RBO, CBUL, and Adverse Selection
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Limited Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	9,204	0	0%	84	0%
	2004	139,577	0	0%	246	0%
	2005	279,772	0	0%	511	0%
	2006	568,551	0	0%	668	0%
	2007	650,615	32,744	5%	669	2%
	2008	629,849	0	0%	619	1%
	2009	578,185	258,871	45%	558	9%
	2010	531,258	115,552	22%	511	11%
	2011	488,285	3,054	1%	482	10%
	2012	460,901	104,261	23%	456	11%
	2013	430,402	94,600	22%	436	12%
	2014	389,152	199,116	51%	369	14%
	2015	336,501	63,364	19%	338	15%
	2016	311,309	204,186	66%	325	17%
Projected Future Experience (50 Years)	2017	297,637	178,016	60%	311	18%
	2018	283,085	193,644	68%	297	20%
	2019	268,244	212,378	79%	283	22%
	2020	253,106	233,105	92%	269	23%
	2021	237,723	253,795	107%	254	25%
	2022	222,156	272,294	123%	239	27%
	2023	206,510	288,546	140%	224	29%
	2024	190,908	298,632	156%	209	31%
	2025	175,472	303,829	173%	194	33%
	2026	160,306	305,432	191%	179	34%
	2027	145,504	305,355	210%	164	36%
	2028	131,173	303,557	231%	150	38%
	2029	117,425	300,776	256%	136	39%
	2030	104,357	294,618	282%	122	41%
	2031	92,053	285,151	310%	109	42%
	2032	80,559	274,681	341%	97	43%
	2033	69,905	262,385	375%	86	44%
	2034	60,138	246,452	410%	75	45%
	2035	51,295	228,516	445%	65	46%
	2036	43,382	208,619	481%	56	47%
	2037	36,377	188,616	518%	48	48%
	2038	30,241	168,773	558%	41	48%
	2039	24,930	149,941	601%	34	49%
	2040	20,384	131,971	647%	29	49%
	2041	16,528	114,649	694%	24	50%
	2042	13,289	98,558	742%	20	50%
	2043	10,590	83,951	793%	16	50%
	2044	8,364	70,758	846%	13	51%
	2045	6,544	58,741	898%	10	51%
	2046	5,070	47,885	944%	8	51%
	2047	3,886	38,578	993%	7	51%
	2048	2,949	30,678	1,040%	5	51%
	2049	2,211	23,851	1,079%	4	51%
	2050	1,635	18,221	1,115%	3	51%
	2051	1,196	13,691	1,145%	2	51%
	2052	863	10,130	1,173%	2	51%
	2053	616	7,403	1,201%	1	51%
	2054	436	5,338	1,225%	1	51%
	2055	305	3,814	1,250%	1	51%
	2056	212	2,696	1,274%	1	51%
	2057-2061	386	5,220	1,353%	1	51%
	2062-2066	52	871	1,678%	0	51%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	7,759,395	1,297,412	17%
Future	2,489,441	3,958,370	159%
Lifetime	10,248,836	5,255,782	51%

Attachment 5F
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to Proposed Increase From Inception
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Limited Benfit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	9,204	0	0%	84	0%
	2004	139,577	0	0%	246	0%
	2005	279,772	0	0%	511	0%
	2006	568,551	0	0%	668	0%
	2007	650,615	32,744	5%	669	2%
	2008	629,849	0	0%	619	1%
	2009	578,185	258,871	45%	558	9%
	2010	531,258	115,552	22%	511	11%
	2011	488,285	3,054	1%	482	10%
	2012	460,901	104,261	23%	456	11%
	2013	430,402	94,600	22%	436	12%
	2014	389,152	199,116	51%	369	14%
	2015	336,501	63,364	19%	338	15%
	2016	311,309	204,186	66%	325	17%
Projected Future Experience (50 Years)	2017	297,637	178,016	60%	311	18%
	2018	283,085	193,644	68%	297	20%
	2019	268,244	212,378	79%	283	22%
	2020	253,106	233,105	92%	269	23%
	2021	237,723	253,795	107%	254	25%
	2022	222,156	272,294	123%	239	27%
	2023	206,510	288,546	140%	224	29%
	2024	190,908	298,632	156%	209	31%
	2025	175,472	303,829	173%	194	33%
	2026	160,306	305,432	191%	179	34%
	2027	145,504	305,355	210%	164	36%
	2028	131,173	303,557	231%	150	38%
	2029	117,425	300,776	256%	136	39%
	2030	104,357	294,618	282%	122	41%
	2031	92,053	285,151	310%	109	42%
	2032	80,559	274,681	341%	97	43%
	2033	69,905	262,385	375%	86	44%
	2034	60,138	246,452	410%	75	45%
	2035	51,295	228,516	445%	65	46%
	2036	43,382	208,619	481%	56	47%
	2037	36,377	188,616	518%	48	48%
	2038	30,241	168,773	558%	41	48%
	2039	24,930	149,941	601%	34	49%
	2040	20,384	131,971	647%	29	49%
	2041	16,528	114,649	694%	24	50%
	2042	13,289	98,558	742%	20	50%
	2043	10,590	83,951	793%	16	50%
	2044	8,364	70,758	846%	13	51%
	2045	6,544	58,741	898%	10	51%
	2046	5,070	47,885	944%	8	51%
	2047	3,886	38,578	993%	7	51%
	2048	2,949	30,678	1,040%	5	51%
	2049	2,211	23,851	1,079%	4	51%
	2050	1,635	18,221	1,115%	3	51%
	2051	1,196	13,691	1,145%	2	51%
	2052	863	10,130	1,173%	2	51%
	2053	616	7,403	1,201%	1	51%
	2054	436	5,338	1,225%	1	51%
	2055	305	3,814	1,250%	1	51%
	2056	212	2,696	1,274%	1	51%
	2057-2061	386	5,220	1,353%	1	51%
	2062-2066	52	871	1,678%	0	51%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	7,759,395	1,297,412	17%
Future	2,489,441	3,958,370	159%
Lifetime	10,248,836	5,255,782	51%

Attachment 5G
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Expected Experience
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Limited Benfit Periods

		Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	8,551	2,026	24%	83	24%
	2004	133,058	32,197	24%	235	24%
	2005	265,195	66,004	25%	501	25%
	2006	549,324	139,586	25%	635	25%
	2007	604,132	167,272	28%	608	26%
	2008	544,187	169,349	31%	531	27%
	2009	475,645	168,721	35%	469	29%
	2010	421,335	170,480	40%	419	30%
	2011	375,798	173,505	46%	375	32%
	2012	336,225	177,225	53%	337	33%
	2013	300,998	181,112	60%	302	35%
	2014	269,151	184,793	69%	271	36%
	2015	240,322	188,149	78%	243	38%
Projected	2016	214,348	191,435	89%	218	40%
Experience	2017	190,973	194,306	102%	195	41%
	2018	169,882	196,506	116%	174	43%
	2019	150,804	197,530	131%	156	45%
	2020	133,468	197,035	148%	139	46%
	2021	117,773	195,250	166%	123	48%
	2022	103,647	192,427	186%	110	49%
	2023	90,909	188,396	207%	97	51%
	2024	79,410	182,788	230%	86	52%
	2025	69,066	175,766	254%	76	53%
	2026	59,793	167,438	280%	66	54%
	2027	51,463	157,887	307%	58	55%
	2028	44,001	147,228	335%	50	56%
	2029	37,361	135,631	363%	44	57%
	2030	31,498	123,536	392%	37	58%
	2031	26,363	111,192	422%	32	58%
	2032	21,902	99,102	452%	27	59%
	2033	18,062	87,463	484%	23	59%
	2034	14,784	76,429	517%	19	60%
	2035	12,012	66,157	551%	16	60%
	2036	9,689	56,642	585%	13	60%
	2037	7,762	48,094	620%	11	60%
	2038	6,177	40,539	656%	9	61%
	2039	4,885	33,907	694%	7	61%
	2040	3,841	28,121	732%	6	61%
	2041	3,004	23,094	769%	5	61%
	2042	2,339	18,839	806%	4	61%
	2043	1,813	15,272	843%	3	61%
	2044	1,400	12,287	878%	3	61%
	2045	1,079	9,817	910%	2	61%
	2046	829	7,785	940%	2	61%
	2047	635	6,143	967%	1	61%
	2048	488	4,836	990%	1	61%
	2049	376	3,798	1,010%	1	61%
	2050	291	2,983	1,027%	1	61%
	2051	226	2,340	1,037%	1	61%
	2052	177	1,848	1,045%	1	61%
	2053	140	1,472	1,054%	0	61%
	2054	112	1,190	1,064%	0	61%
	2055	90	973	1,076%	0	61%
	2056	74	808	1,091%	0	61%
	2057-2061	221	2,610	1,180%	1	61%
	2062-2066	94	1,473	1,566%	0	61%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	6,741,206	2,681,332	40%
Future	1,118,731	2,122,404	190%
Lifetime	7,859,937	4,803,735	61%

Attachment 5H
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Limited Benfit Periods

		Actual or Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	9,204	0	0%	84	0%
	2004	139,577	0	0%	246	0%
	2005	279,772	0	0%	511	0%
	2006	568,551	0	0%	668	0%
	2007	650,615	32,744	5%	669	2%
	2008	629,849	0	0%	619	1%
	2009	578,185	258,871	45%	558	9%
	2010	531,258	115,552	22%	511	11%
	2011	488,285	3,054	1%	482	10%
	2012	460,901	104,261	23%	456	11%
	2013	430,402	94,600	22%	436	12%
	2014	389,152	199,116	51%	369	14%
	2015	336,501	63,364	19%	338	14%
	2016	311,309	204,186	66%	325	16%
Projected Future Experience (50 Years)	2017	288,164	298,629	104%	291	19%
	2018	256,409	299,960	117%	260	22%
	2019	227,673	299,751	132%	232	25%
	2020	201,558	297,615	148%	207	27%
	2021	177,910	293,529	165%	184	29%
	2022	156,587	288,248	184%	163	31%
	2023	137,326	281,578	205%	144	33%
	2024	119,944	272,650	227%	127	35%
	2025	104,308	261,023	250%	112	36%
	2026	90,305	247,679	274%	98	38%
	2027	77,735	233,034	300%	86	39%
	2028	66,481	217,130	327%	74	40%
	2029	56,468	200,157	354%	64	41%
	2030	47,631	182,400	383%	55	42%
	2031	39,897	164,245	412%	47	43%
	2032	33,185	146,576	442%	39	43%
	2033	27,405	129,680	473%	33	44%
	2034	22,470	113,756	506%	28	44%
	2035	18,292	98,937	541%	23	45%
	2036	14,784	85,109	576%	19	45%
	2037	11,865	72,606	612%	15	45%
	2038	9,455	61,526	651%	13	45%
	2039	7,482	51,764	692%	10	46%
	2040	5,879	43,125	733%	8	46%
	2041	4,586	35,519	774%	7	46%
	2042	3,555	29,028	817%	5	46%
	2043	2,735	23,540	861%	4	46%
	2044	2,089	18,859	903%	3	46%
	2045	1,585	14,930	942%	2	46%
	2046	1,191	11,674	980%	2	46%
	2047	884	9,024	1,021%	1	46%
	2048	653	6,917	1,059%	1	46%
	2049	479	5,233	1,092%	1	46%
	2050	348	3,914	1,124%	1	46%
	2051	250	2,893	1,157%	0	46%
	2052	178	2,116	1,188%	0	46%
	2053	125	1,527	1,224%	0	46%
	2054	87	1,098	1,256%	0	46%
	2055	61	782	1,290%	0	46%
	2056	42	554	1,323%	0	46%
	2057-2061	76	1,061	1,396%	0	46%
	2062-2066	10	151	1,553%	0	46%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	8,108,781	1,332,397	16%
Future	1,689,556	3,184,009	188%
Lifetime	9,798,336	4,516,407	46%

Attachment 6A
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	11,232	0	0%	67	0%
	2004	150,405	0	0%	173	0%
	2005	257,865	441	0%	298	0%
	2006	419,063	459	0%	414	0%
	2007	552,164	94,525	17%	453	6%
	2008	549,393	0	0%	404	5%
	2009	501,957	91,456	18%	366	7%
	2010	466,996	186,798	40%	345	12%
	2011	435,456	252,529	58%	328	17%
	2012	408,715	110,877	27%	310	18%
	2013	386,715	0	0%	299	17%
	2014	369,592	0	0%	275	16%
	2015	344,480	402,152	117%	257	21%
	2016	322,311	60,539	19%	252	21%
Projected Future Experience (50 Years)	2017	312,537	132,473	42%	243	22%
	2018	300,224	152,109	51%	234	23%
	2019	287,812	175,924	61%	225	24%
	2020	275,082	205,355	75%	215	26%
	2021	262,010	239,073	91%	206	28%
	2022	248,610	276,301	111%	196	30%
	2023	234,931	315,921	134%	186	32%
	2024	221,026	355,622	161%	175	34%
	2025	206,990	393,500	190%	165	37%
	2026	192,898	430,864	223%	155	40%
	2027	178,805	469,927	263%	144	42%
	2028	164,773	507,539	308%	134	45%
	2029	150,877	544,986	361%	123	48%
	2030	137,194	581,167	424%	113	51%
	2031	123,814	609,928	493%	103	55%
	2032	110,844	634,632	573%	93	58%
	2033	98,387	651,641	662%	83	61%
	2034	86,556	657,581	760%	74	64%
	2035	75,473	651,242	863%	66	67%
	2036	65,233	632,308	969%	58	70%
	2037	55,899	608,538	1,089%	50	72%
	2038	47,502	579,594	1,220%	44	74%
	2039	40,040	548,086	1,369%	37	77%
	2040	33,493	512,971	1,532%	32	78%
	2041	27,813	475,108	1,708%	27	80%
	2042	22,934	435,644	1,900%	23	82%
	2043	18,780	394,865	2,103%	19	83%
	2044	15,276	356,084	2,331%	16	84%
	2045	12,348	318,706	2,581%	13	85%
	2046	9,921	283,401	2,856%	11	86%
	2047	7,930	250,432	3,158%	9	87%
	2048	6,309	220,403	3,493%	7	87%
	2049	4,995	193,485	3,874%	6	88%
	2050	3,933	169,556	4,311%	5	88%
	2051	3,093	148,855	4,813%	4	89%
	2052	2,427	130,778	5,389%	3	89%
	2053	1,899	114,395	6,024%	3	89%
	2054	1,487	100,281	6,745%	2	89%
	2055	1,161	87,827	7,562%	2	90%
	2056	906	76,909	8,488%	1	90%
	2057-2061	2,232	251,217	11,257%	4	90%
	2062-2066	548	96,054	17,542%	1	90%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	6,859,232	1,452,685	21%
Future	2,907,457	7,369,990	253%
Lifetime	9,766,689	8,822,674	90%

Attachment 6B
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	11,232	0	0%	67	0%
	2004	150,405	0	0%	173	0%
	2005	257,865	441	0%	298	0%
	2006	419,063	459	0%	414	0%
	2007	552,164	94,525	17%	453	6%
	2008	549,393	0	0%	404	5%
	2009	501,957	91,456	18%	366	7%
	2010	466,996	186,798	40%	345	12%
	2011	435,456	252,529	58%	328	17%
	2012	408,715	110,877	27%	310	18%
	2013	386,715	0	0%	299	17%
	2014	375,943	0	0%	275	16%
	2015	397,862	402,152	101%	257	21%
	2016	402,978	60,539	15%	252	21%
Projected Future Experience (50 Years)	2017	398,037	138,230	35%	243	21%
	2018	382,717	158,640	41%	234	22%
	2019	367,191	183,385	50%	225	24%
	2020	350,936	213,965	61%	215	25%
	2021	334,240	248,988	74%	206	26%
	2022	317,120	287,628	91%	196	28%
	2023	299,640	328,727	110%	186	30%
	2024	281,868	369,887	131%	175	33%
	2025	263,920	409,116	155%	165	35%
	2026	245,892	447,780	182%	155	37%
	2027	227,855	488,179	214%	144	40%
	2028	209,889	527,039	251%	134	43%
	2029	192,091	565,695	294%	123	46%
	2030	174,563	603,028	345%	113	49%
	2031	157,426	632,642	402%	103	52%
	2032	140,819	658,023	467%	93	55%
	2033	124,881	675,404	541%	83	57%
	2034	109,757	681,304	621%	74	60%
	2035	95,604	674,507	706%	66	63%
	2036	82,545	654,681	793%	58	66%
	2037	70,660	629,876	891%	50	68%
	2038	59,985	599,748	1,000%	44	70%
	2039	50,516	566,999	1,122%	37	72%
	2040	42,222	530,566	1,257%	32	74%
	2041	35,035	491,321	1,402%	27	75%
	2042	28,870	450,447	1,560%	23	77%
	2043	23,626	408,242	1,728%	19	78%
	2044	19,206	368,119	1,917%	16	79%
	2045	15,515	329,464	2,124%	13	80%
	2046	12,458	292,953	2,352%	11	81%
	2047	9,949	258,857	2,602%	9	82%
	2048	7,909	227,808	2,880%	7	82%
	2049	6,255	199,975	3,197%	6	83%
	2050	4,919	175,238	3,563%	5	83%
	2051	3,863	153,840	3,982%	4	83%
	2052	3,028	135,158	4,464%	3	84%
	2053	2,367	118,236	4,995%	3	84%
	2054	1,852	103,660	5,597%	2	84%
	2055	1,446	90,796	6,281%	2	84%
	2056	1,128	79,521	7,052%	1	84%
	2057-2061	2,779	259,844	9,351%	4	85%
	2062-2066	683	99,404	14,547%	1	85%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	7,005,391	1,452,685	21%
Future	3,702,415	7,645,494	207%
Lifetime	10,707,806	9,098,179	85%

Attachment 6D
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	11,232	0	0%	67	0%
	2004	150,405	0	0%	173	0%
	2005	257,865	441	0%	298	0%
	2006	419,063	459	0%	414	0%
	2007	552,164	94,525	17%	453	6%
	2008	549,393	0	0%	404	5%
	2009	501,957	91,456	18%	366	7%
	2010	466,996	186,798	40%	345	12%
	2011	435,456	252,529	58%	328	17%
	2012	408,715	110,877	27%	310	18%
	2013	386,715	0	0%	299	17%
	2014	369,592	0	0%	275	16%
	2015	344,480	402,152	117%	257	21%
	2016	322,311	60,539	19%	252	21%
Projected Future Experience (50 Years)	2017	312,537	132,473	42%	243	22%
	2018	335,693	149,515	45%	221	23%
	2019	507,016	159,099	31%	202	24%
	2020	515,778	182,775	35%	194	24%
	2021	491,268	212,220	43%	185	25%
	2022	466,144	244,632	52%	176	26%
	2023	440,495	279,025	63%	167	27%
	2024	414,423	313,356	76%	158	29%
	2025	388,107	345,937	89%	149	31%
	2026	361,683	377,958	104%	139	32%
	2027	335,260	411,382	123%	130	34%
	2028	308,949	443,465	144%	120	36%
	2029	282,895	475,346	168%	111	38%
	2030	257,238	506,069	197%	102	40%
	2031	232,151	530,283	228%	92	42%
	2032	207,832	550,956	265%	84	45%
	2033	184,476	564,955	306%	75	47%
	2034	162,293	569,373	351%	67	49%
	2035	141,512	563,198	398%	59	51%
	2036	122,312	546,183	447%	52	53%
	2037	104,810	525,072	501%	45	54%
	2038	89,066	499,583	561%	39	56%
	2039	75,075	471,969	629%	34	57%
	2040	62,800	441,339	703%	29	59%
	2041	52,150	408,428	783%	25	60%
	2042	43,002	374,220	870%	21	61%
	2043	35,212	338,955	963%	17	62%
	2044	28,642	305,468	1,067%	15	63%
	2045	23,152	273,243	1,180%	12	63%
	2046	18,603	242,843	1,305%	10	64%
	2047	14,869	214,487	1,443%	8	64%
	2048	11,830	188,683	1,595%	7	65%
	2049	9,366	165,569	1,768%	5	65%
	2050	7,375	145,037	1,967%	4	65%
	2051	5,800	127,284	2,195%	4	66%
	2052	4,550	111,792	2,457%	3	66%
	2053	3,561	97,759	2,746%	2	66%
	2054	2,788	85,676	3,073%	2	66%
	2055	2,178	75,018	3,445%	2	66%
	2056	1,699	65,679	3,866%	1	67%
	2057-2061	4,184	214,441	5,125%	3	67%
	2062-2066	1,027	81,945	7,982%	1	67%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	6,859,232	1,452,685	21%
Future	4,940,602	6,446,494	130%
Lifetime	11,799,835	7,899,179	67%

Attachment 6E
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase without RBO, CBUL, and Adverse Selection
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	11,232	0	0%	67	0%
	2004	150,405	0	0%	173	0%
	2005	257,865	441	0%	298	0%
	2006	419,063	459	0%	414	0%
	2007	552,164	94,525	17%	453	6%
	2008	549,393	0	0%	404	5%
	2009	501,957	91,456	18%	366	7%
	2010	466,996	186,798	40%	345	12%
	2011	435,456	252,529	58%	328	17%
	2012	408,715	110,877	27%	310	18%
	2013	386,715	0	0%	299	17%
	2014	369,592	0	0%	275	16%
	2015	344,480	402,152	117%	257	21%
	2016	322,311	60,539	19%	252	21%
Projected Future Experience (50 Years)	2017	312,537	132,473	42%	243	22%
	2018	352,920	153,118	43%	234	23%
	2019	613,486	183,095	30%	225	23%
	2020	632,688	214,549	34%	215	24%
	2021	602,622	249,113	41%	206	25%
	2022	571,803	287,159	50%	196	26%
	2023	540,341	327,532	61%	186	28%
	2024	508,359	367,831	72%	175	29%
	2025	476,077	406,076	85%	165	31%
	2026	443,665	443,664	100%	155	33%
	2027	411,252	482,898	117%	144	35%
	2028	378,978	520,558	137%	134	37%
	2029	347,017	557,982	161%	123	39%
	2030	315,546	594,045	188%	113	41%
	2031	284,772	622,469	219%	103	44%
	2032	254,940	646,736	254%	93	46%
	2033	226,290	663,169	293%	83	48%
	2034	199,080	668,355	336%	74	51%
	2035	173,589	661,106	381%	66	53%
	2036	150,036	641,133	427%	58	55%
	2037	128,567	616,353	479%	50	57%
	2038	109,254	586,433	537%	44	58%
	2039	92,092	554,018	602%	37	60%
	2040	77,035	518,063	673%	32	61%
	2041	63,971	479,431	749%	27	63%
	2042	52,749	439,276	833%	23	64%
	2043	43,194	397,880	921%	19	65%
	2044	35,134	358,572	1,021%	16	65%
	2045	28,400	320,744	1,129%	13	66%
	2046	22,819	285,060	1,249%	11	67%
	2047	18,239	251,774	1,380%	9	67%
	2048	14,512	221,485	1,526%	7	68%
	2049	11,488	194,352	1,692%	6	68%
	2050	9,047	170,250	1,882%	5	69%
	2051	7,114	149,412	2,100%	4	69%
	2052	5,581	131,226	2,351%	3	69%
	2053	4,368	114,754	2,627%	3	69%
	2054	3,420	100,571	2,941%	2	69%
	2055	2,671	88,060	3,297%	2	70%
	2056	2,084	77,097	3,699%	1	70%
	2057-2061	5,133	251,720	4,904%	4	70%
	2062-2066	1,259	96,191	7,638%	1	70%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	6,859,232	1,452,685	21%
Future	5,928,130	7,520,280	127%
Lifetime	12,787,362	8,972,965	70%

Attachment 6F
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to Proposed Increase From Inception
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	25,834	0	0%	67	0%
	2004	345,931	0	0%	173	0%
	2005	593,089	441	0%	298	0%
	2006	963,845	459	0%	414	0%
	2007	1,269,978	94,525	7%	453	3%
	2008	1,263,605	0	0%	404	2%
	2009	1,154,501	91,456	8%	366	3%
	2010	1,074,090	186,798	17%	345	5%
	2011	1,001,548	252,529	25%	328	8%
	2012	940,044	110,877	12%	310	8%
	2013	889,445	0	0%	299	7%
	2014	850,062	0	0%	275	7%
	2015	792,303	402,152	51%	257	9%
	2016	741,314	60,539	8%	252	9%
Projected Future Experience (50 Years)	2017	718,835	144,462	20%	243	10%
	2018	690,514	165,387	24%	234	10%
	2019	661,969	190,754	29%	225	11%
	2020	632,688	222,058	35%	215	12%
	2021	602,622	257,832	43%	206	12%
	2022	571,803	297,210	52%	196	13%
	2023	540,341	338,995	63%	186	14%
	2024	508,359	380,705	75%	175	15%
	2025	476,077	420,288	88%	165	17%
	2026	443,665	459,192	103%	155	18%
	2027	411,252	499,799	122%	144	19%
	2028	378,978	538,778	142%	134	21%
	2029	347,017	577,511	166%	123	22%
	2030	315,546	614,837	195%	113	23%
	2031	284,772	644,256	226%	103	25%
	2032	254,940	669,372	263%	93	26%
	2033	226,290	686,380	303%	83	28%
	2034	199,080	691,747	347%	74	29%
	2035	173,589	684,245	394%	66	31%
	2036	150,036	663,573	442%	58	32%
	2037	128,567	637,925	496%	50	33%
	2038	109,254	606,958	556%	44	34%
	2039	92,092	573,409	623%	37	35%
	2040	77,035	536,195	696%	32	36%
	2041	63,971	496,211	776%	27	37%
	2042	52,749	454,650	862%	23	37%
	2043	43,194	411,806	953%	19	38%
	2044	35,134	371,122	1,056%	16	38%
	2045	28,400	331,970	1,169%	13	39%
	2046	22,819	295,037	1,293%	11	39%
	2047	18,239	260,586	1,429%	9	40%
	2048	14,512	229,237	1,580%	7	40%
	2049	11,488	201,155	1,751%	6	40%
	2050	9,047	176,209	1,948%	5	40%
	2051	7,114	154,641	2,174%	4	40%
	2052	5,581	135,819	2,434%	3	41%
	2053	4,368	118,771	2,719%	3	41%
	2054	3,420	104,091	3,044%	2	41%
	2055	2,671	91,142	3,412%	2	41%
	2056	2,084	79,796	3,829%	1	41%
	2057-2061	5,133	260,531	5,076%	4	41%
	2062-2066	1,259	99,557	7,905%	1	41%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	15,776,233	1,452,685	9%
Future	6,687,150	7,798,319	117%
Lifetime	22,463,383	9,251,003	41%

Attachment 6G
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Expected Experience
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	10,528	1,298	12%	69	12%
	2004	153,609	18,896	12%	179	12%
	2005	246,927	32,794	13%	287	13%
	2006	393,184	54,431	14%	398	13%
	2007	511,210	77,466	15%	419	14%
	2008	487,912	85,355	17%	364	15%
	2009	424,814	88,774	21%	321	16%
	2010	375,802	93,815	25%	286	17%
	2011	335,502	99,896	30%	256	18%
	2012	300,760	106,888	36%	230	20%
	2013	270,104	114,832	43%	207	21%
	2014	242,635	123,579	51%	186	23%
	2015	217,825	132,979	61%	167	24%
Projected	2016	195,562	143,390	73%	151	26%
Experience	2017	175,523	154,478	88%	136	28%
	2018	157,438	165,725	105%	122	29%
	2019	141,076	177,080	126%	110	31%
	2020	126,222	188,042	149%	99	33%
	2021	112,727	198,566	176%	89	35%
	2022	100,491	208,858	208%	80	37%
	2023	89,404	218,507	244%	72	39%
	2024	79,364	227,228	286%	64	41%
	2025	70,236	234,391	334%	57	43%
	2026	61,934	239,716	387%	51	45%
	2027	54,372	242,961	447%	46	47%
	2028	47,472	243,089	512%	40	49%
	2029	41,197	240,273	583%	36	51%
	2030	35,533	234,461	660%	31	52%
	2031	30,459	225,953	742%	27	54%
	2032	25,946	215,792	832%	24	55%
	2033	21,964	204,049	929%	21	56%
	2034	18,480	191,179	1,035%	18	57%
	2035	15,457	177,287	1,147%	15	58%
	2036	12,858	163,029	1,268%	13	59%
	2037	10,644	149,031	1,400%	11	60%
	2038	8,774	135,419	1,543%	10	61%
	2039	7,206	122,534	1,700%	8	61%
	2040	5,903	110,252	1,868%	7	62%
	2041	4,825	98,780	2,047%	6	62%
	2042	3,938	88,229	2,241%	5	62%
	2043	3,212	78,641	2,448%	4	63%
	2044	2,621	69,938	2,668%	4	63%
	2045	2,141	62,065	2,898%	3	63%
	2046	1,752	54,958	3,137%	3	63%
	2047	1,436	48,706	3,392%	2	64%
	2048	1,180	43,234	3,663%	2	64%
	2049	973	38,405	3,946%	2	64%
	2050	804	34,125	4,242%	1	64%
	2051	668	30,403	4,552%	1	64%
	2052	557	27,198	4,883%	1	64%
	2053	467	24,425	5,235%	1	64%
	2054	393	22,044	5,604%	1	64%
	2055	333	19,907	5,982%	1	64%
	2056	282	18,009	6,376%	1	64%
	2057-2061	899	68,726	7,648%	2	64%
	2062-2066	410	45,442	11,076%	1	64%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	5,914,556	1,524,406	26%
Future	1,096,231	2,991,517	273%
Lifetime	7,010,787	4,515,923	64%

Attachment 6H
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Limited Benefit Periods

		Actual or Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	11,232	0	0%	67	0%
	2004	150,405	0	0%	173	0%
	2005	257,865	441	0%	298	0%
	2006	419,063	459	0%	414	0%
	2007	552,164	94,525	17%	453	7%
	2008	549,393	0	0%	404	5%
	2009	501,957	91,456	18%	366	7%
	2010	466,996	186,798	40%	345	12%
	2011	435,456	252,529	58%	328	17%
	2012	408,715	110,877	27%	310	18%
	2013	386,715	0	0%	299	17%
	2014	369,592	0	0%	275	16%
	2015	344,480	402,152	117%	257	21%
	2016	322,311	60,539	19%	252	21%
Projected Future Experience (50 Years)	2017	302,073	264,377	88%	226	24%
	2018	270,717	281,418	104%	203	26%
	2019	242,446	298,945	123%	183	29%
	2020	216,836	316,407	146%	164	31%
	2021	193,621	333,705	172%	147	34%
	2022	172,596	351,318	204%	132	37%
	2023	153,563	368,422	240%	118	39%
	2024	136,386	384,633	282%	106	42%
	2025	120,771	398,973	330%	94	45%
	2026	106,555	410,248	385%	84	47%
	2027	93,607	418,442	447%	74	50%
	2028	81,769	420,869	515%	65	52%
	2029	70,972	418,365	589%	57	55%
	2030	61,195	410,665	671%	50	57%
	2031	52,406	396,991	758%	43	59%
	2032	44,566	380,274	853%	37	61%
	2033	37,626	360,360	958%	32	62%
	2034	31,533	338,524	1,074%	27	64%
	2035	26,231	314,375	1,198%	23	65%
	2036	21,664	288,753	1,333%	19	66%
	2037	17,769	263,210	1,481%	16	67%
	2038	14,479	237,688	1,642%	13	68%
	2039	11,726	213,483	1,821%	11	69%
	2040	9,441	190,133	2,014%	9	70%
	2041	7,560	168,173	2,225%	8	70%
	2042	6,022	147,727	2,453%	6	71%
	2043	4,776	128,890	2,699%	5	71%
	2044	3,772	112,062	2,971%	4	71%
	2045	2,968	96,992	3,268%	3	72%
	2046	2,327	83,665	3,595%	3	72%
	2047	1,818	71,960	3,957%	2	72%
	2048	1,417	61,674	4,353%	2	72%
	2049	1,101	52,793	4,794%	1	72%
	2050	852	45,106	5,294%	1	72%
	2051	659	38,590	5,859%	1	72%
	2052	508	33,017	6,495%	1	73%
	2053	390	28,022	7,187%	1	73%
	2054	301	23,816	7,902%	0	73%
	2055	233	20,201	8,686%	0	73%
	2056	179	17,024	9,504%	0	73%
	2057-2061	427	50,337	11,795%	1	73%
	2062-2066	100	16,556	16,575%	0	73%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	7,180,107	1,503,254	21%
Future	1,881,128	5,091,482	271%
Lifetime	9,061,235	6,594,736	73%

Attachment 7A
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,263	0	0%	15	0%
	2004	30,119	0	0%	46	0%
	2005	72,488	0	0%	98	0%
	2006	213,265	0	0%	220	0%
	2007	292,761	0	0%	220	0%
	2008	268,598	0	0%	201	0%
	2009	246,357	286,847	116%	177	23%
	2010	228,673	0	0%	169	20%
	2011	221,585	255,963	116%	166	32%
	2012	208,463	0	0%	158	29%
	2013	197,115	196,919	100%	152	35%
	2014	175,423	307,649	175%	126	44%
	2015	150,504	0	0%	120	42%
	2016	146,147	163,158	112%	117	45%
Projected Future Experience (50 Years)	2017	140,909	118,407	84%	113	47%
	2018	134,795	127,523	95%	108	48%
	2019	128,537	139,580	109%	103	50%
	2020	122,143	153,536	126%	99	53%
	2021	115,626	167,630	145%	94	55%
	2022	109,004	180,252	165%	89	57%
	2023	102,306	190,881	187%	84	60%
	2024	95,575	197,186	206%	79	62%
	2025	88,859	200,456	226%	74	65%
	2026	82,197	201,692	245%	69	67%
	2027	75,627	200,805	266%	64	70%
	2028	69,190	198,742	287%	59	72%
	2029	62,933	196,530	312%	54	74%
	2030	56,904	193,245	340%	50	76%
	2031	51,140	187,921	367%	45	78%
	2032	45,667	181,978	398%	41	80%
	2033	40,502	174,978	432%	37	81%
	2034	35,675	165,438	464%	33	83%
	2035	31,212	154,343	495%	29	84%
	2036	27,126	142,670	526%	26	85%
	2037	23,419	130,851	559%	23	86%
	2038	20,089	119,222	593%	20	87%
	2039	17,123	108,092	631%	18	88%
	2040	14,508	97,531	672%	15	89%
	2041	12,219	87,122	713%	13	90%
	2042	10,230	77,181	754%	11	90%
	2043	8,516	67,888	797%	10	91%
	2044	7,045	59,305	842%	8	91%
	2045	5,797	51,711	892%	7	91%
	2046	4,745	44,282	933%	6	92%
	2047	3,867	37,648	974%	5	92%
	2048	3,138	31,700	1,010%	4	92%
	2049	2,534	26,457	1,044%	4	92%
	2050	2,042	22,167	1,085%	3	92%
	2051	1,647	18,370	1,116%	2	92%
	2052	1,326	15,218	1,148%	2	92%
	2053	1,070	12,696	1,187%	2	92%
	2054	865	10,744	1,242%	1	92%
	2055	702	9,244	1,317%	1	93%
	2056	572	7,919	1,385%	1	93%
	2057-2061	1,691	27,512	1,627%	4	93%
	2062-2066	734	15,566	2,121%	2	93%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,207,831	1,445,009	45%
Future	1,268,067	2,704,206	213%
Lifetime	4,475,898	4,149,215	93%

Attachment 7B
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,263	0	0%	15	0%
	2004	30,119	0	0%	46	0%
	2005	72,488	0	0%	98	0%
	2006	213,265	0	0%	220	0%
	2007	292,761	0	0%	220	0%
	2008	268,598	0	0%	201	0%
	2009	246,357	286,847	116%	177	23%
	2010	228,673	0	0%	169	20%
	2011	221,585	255,963	116%	166	32%
	2012	208,463	0	0%	158	29%
	2013	197,115	196,919	100%	152	35%
	2014	179,999	307,649	171%	126	44%
	2015	188,958	0	0%	120	41%
	2016	193,148	163,158	84%	117	44%
Projected Future Experience (50 Years)	2017	187,589	124,935	67%	113	45%
	2018	179,424	134,486	75%	108	46%
	2019	171,064	147,127	86%	103	48%
	2020	162,522	161,763	100%	99	50%
	2021	153,816	176,531	115%	94	52%
	2022	144,969	189,727	131%	89	54%
	2023	136,020	200,811	148%	84	56%
	2024	127,029	207,334	163%	79	59%
	2025	118,060	210,659	178%	74	61%
	2026	109,166	211,843	194%	69	63%
	2027	100,398	210,792	210%	64	65%
	2028	91,810	208,507	227%	59	67%
	2029	83,466	206,071	247%	54	69%
	2030	75,429	202,521	268%	50	71%
	2031	67,750	196,840	291%	45	72%
	2032	60,461	190,518	315%	41	74%
	2033	53,586	183,100	342%	37	76%
	2034	47,163	173,035	367%	33	77%
	2035	41,228	161,355	391%	29	78%
	2036	35,798	149,083	416%	26	79%
	2037	30,876	136,669	443%	23	80%
	2038	26,455	124,466	470%	20	81%
	2039	22,521	112,799	501%	18	82%
	2040	19,055	101,734	534%	15	82%
	2041	16,025	90,840	567%	13	83%
	2042	13,393	80,442	601%	11	84%
	2043	11,130	70,730	635%	10	84%
	2044	9,188	61,763	672%	8	84%
	2045	7,543	53,835	714%	7	85%
	2046	6,159	46,086	748%	6	85%
	2047	5,008	39,169	782%	5	85%
	2048	4,054	32,970	813%	4	85%
	2049	3,264	27,508	843%	4	85%
	2050	2,623	23,040	878%	3	85%
	2051	2,108	19,088	905%	2	86%
	2052	1,693	15,809	934%	2	86%
	2053	1,363	13,185	968%	2	86%
	2054	1,100	11,155	1,014%	1	86%
	2055	891	9,596	1,077%	1	86%
	2056	725	8,219	1,134%	1	86%
	2057-2061	2,148	28,549	1,329%	4	86%
	2062-2066	945	16,154	1,709%	2	86%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,301,779	1,445,009	44%
Future	1,684,070	2,837,890	169%
Lifetime	4,985,850	4,282,899	86%

Attachment 7D
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,263	0	0%	15	0%
	2004	30,119	0	0%	46	0%
	2005	72,488	0	0%	98	0%
	2006	213,265	0	0%	220	0%
	2007	292,761	0	0%	220	0%
	2008	268,598	0	0%	201	0%
	2009	246,357	286,847	116%	177	23%
	2010	228,673	0	0%	169	20%
	2011	221,585	255,963	116%	166	32%
	2012	208,463	0	0%	158	29%
	2013	197,115	196,919	100%	152	35%
	2014	175,423	307,649	175%	126	44%
	2015	150,504	0	0%	120	42%
	2016	146,147	163,158	112%	117	45%
Projected Future Experience (50 Years)	2017	140,909	118,407	84%	113	47%
	2018	134,795	127,523	95%	108	48%
	2019	128,537	139,580	109%	103	50%
	2020	122,143	153,536	126%	99	53%
	2021	115,626	167,630	145%	94	55%
	2022	109,004	180,252	165%	89	57%
	2023	102,306	190,881	187%	84	60%
	2024	95,575	197,186	206%	79	62%
	2025	88,859	200,456	226%	74	65%
	2026	82,197	201,692	245%	69	67%
	2027	75,627	200,805	266%	64	70%
	2028	69,190	198,742	287%	59	72%
	2029	62,933	196,530	312%	54	74%
	2030	56,904	193,245	340%	50	76%
	2031	51,140	187,921	367%	45	78%
	2032	45,667	181,978	398%	41	80%
	2033	40,502	174,978	432%	37	81%
	2034	35,675	165,438	464%	33	83%
	2035	31,212	154,343	495%	29	84%
	2036	27,126	142,670	526%	26	85%
	2037	23,419	130,851	559%	23	86%
	2038	20,089	119,222	593%	20	87%
	2039	17,123	108,092	631%	18	88%
	2040	14,508	97,531	672%	15	89%
	2041	12,219	87,122	713%	13	90%
	2042	10,230	77,181	754%	11	90%
	2043	8,516	67,888	797%	10	91%
	2044	7,045	59,305	842%	8	91%
	2045	5,797	51,711	892%	7	91%
	2046	4,745	44,282	933%	6	92%
	2047	3,867	37,648	974%	5	92%
	2048	3,138	31,700	1,010%	4	92%
	2049	2,534	26,457	1,044%	4	92%
	2050	2,042	22,167	1,085%	3	92%
	2051	1,647	18,370	1,116%	2	92%
	2052	1,326	15,218	1,148%	2	92%
	2053	1,070	12,696	1,187%	2	92%
	2054	865	10,744	1,242%	1	92%
	2055	702	9,244	1,317%	1	93%
	2056	572	7,919	1,385%	1	93%
	2057-2061	1,691	27,512	1,627%	4	93%
	2062-2066	734	15,566	2,121%	2	93%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,207,831	1,445,009	45%
Future	1,268,067	2,704,206	213%
Lifetime	4,475,898	4,149,215	93%

Attachment 7E
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase without RBO, CBUL, and Adverse Selection
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,263	0	0%	15	0%
	2004	30,119	0	0%	46	0%
	2005	72,488	0	0%	98	0%
	2006	213,265	0	0%	220	0%
	2007	292,761	0	0%	220	0%
	2008	268,598	0	0%	201	0%
	2009	246,357	286,847	116%	177	23%
	2010	228,673	0	0%	169	20%
	2011	221,585	255,963	116%	166	32%
	2012	208,463	0	0%	158	29%
	2013	197,115	196,919	100%	152	35%
	2014	175,423	307,649	175%	126	44%
	2015	150,504	0	0%	120	42%
	2016	146,147	163,158	112%	117	45%
Projected Future Experience (50 Years)	2017	140,909	118,407	84%	113	47%
	2018	134,795	127,523	95%	108	48%
	2019	128,537	139,580	109%	103	50%
	2020	122,143	153,536	126%	99	53%
	2021	115,626	167,630	145%	94	55%
	2022	109,004	180,252	165%	89	57%
	2023	102,306	190,881	187%	84	60%
	2024	95,575	197,186	206%	79	62%
	2025	88,859	200,456	226%	74	65%
	2026	82,197	201,692	245%	69	67%
	2027	75,627	200,805	266%	64	70%
	2028	69,190	198,742	287%	59	72%
	2029	62,933	196,530	312%	54	74%
	2030	56,904	193,245	340%	50	76%
	2031	51,140	187,921	367%	45	78%
	2032	45,667	181,978	398%	41	80%
	2033	40,502	174,978	432%	37	81%
	2034	35,675	165,438	464%	33	83%
	2035	31,212	154,343	495%	29	84%
	2036	27,126	142,670	526%	26	85%
	2037	23,419	130,851	559%	23	86%
	2038	20,089	119,222	593%	20	87%
	2039	17,123	108,092	631%	18	88%
	2040	14,508	97,531	672%	15	89%
	2041	12,219	87,122	713%	13	90%
	2042	10,230	77,181	754%	11	90%
	2043	8,516	67,888	797%	10	91%
	2044	7,045	59,305	842%	8	91%
	2045	5,797	51,711	892%	7	91%
	2046	4,745	44,282	933%	6	92%
	2047	3,867	37,648	974%	5	92%
	2048	3,138	31,700	1,010%	4	92%
	2049	2,534	26,457	1,044%	4	92%
	2050	2,042	22,167	1,085%	3	92%
	2051	1,647	18,370	1,116%	2	92%
	2052	1,326	15,218	1,148%	2	92%
	2053	1,070	12,696	1,187%	2	92%
	2054	865	10,744	1,242%	1	92%
	2055	702	9,244	1,317%	1	93%
	2056	572	7,919	1,385%	1	93%
	2057-2061	1,691	27,512	1,627%	4	93%
	2062-2066	734	15,566	2,121%	2	93%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,207,831	1,445,009	45%
Future	1,268,067	2,704,206	213%
Lifetime	4,475,898	4,149,215	93%

Attachment 7F
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to Proposed Increase From Inception
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,263	0	0%	15	0%
	2004	30,119	0	0%	46	0%
	2005	72,488	0	0%	98	0%
	2006	213,265	0	0%	220	0%
	2007	292,761	0	0%	220	0%
	2008	268,598	0	0%	201	0%
	2009	246,357	286,847	116%	177	23%
	2010	228,673	0	0%	169	20%
	2011	221,585	255,963	116%	166	32%
	2012	208,463	0	0%	158	29%
	2013	197,115	196,919	100%	152	35%
	2014	175,423	307,649	175%	126	44%
	2015	150,504	0	0%	120	42%
	2016	146,147	163,158	112%	117	45%
Projected Future Experience (50 Years)	2017	140,909	118,407	84%	113	47%
	2018	134,795	127,523	95%	108	48%
	2019	128,537	139,580	109%	103	50%
	2020	122,143	153,536	126%	99	53%
	2021	115,626	167,630	145%	94	55%
	2022	109,004	180,252	165%	89	57%
	2023	102,306	190,881	187%	84	60%
	2024	95,575	197,186	206%	79	62%
	2025	88,859	200,456	226%	74	65%
	2026	82,197	201,692	245%	69	67%
	2027	75,627	200,805	266%	64	70%
	2028	69,190	198,742	287%	59	72%
	2029	62,933	196,530	312%	54	74%
	2030	56,904	193,245	340%	50	76%
	2031	51,140	187,921	367%	45	78%
	2032	45,667	181,978	398%	41	80%
	2033	40,502	174,978	432%	37	81%
	2034	35,675	165,438	464%	33	83%
	2035	31,212	154,343	495%	29	84%
	2036	27,126	142,670	526%	26	85%
	2037	23,419	130,851	559%	23	86%
	2038	20,089	119,222	593%	20	87%
	2039	17,123	108,092	631%	18	88%
	2040	14,508	97,531	672%	15	89%
	2041	12,219	87,122	713%	13	90%
	2042	10,230	77,181	754%	11	90%
	2043	8,516	67,888	797%	10	91%
	2044	7,045	59,305	842%	8	91%
	2045	5,797	51,711	892%	7	91%
	2046	4,745	44,282	933%	6	92%
	2047	3,867	37,648	974%	5	92%
	2048	3,138	31,700	1,010%	4	92%
	2049	2,534	26,457	1,044%	4	92%
	2050	2,042	22,167	1,085%	3	92%
	2051	1,647	18,370	1,116%	2	92%
	2052	1,326	15,218	1,148%	2	92%
	2053	1,070	12,696	1,187%	2	92%
	2054	865	10,744	1,242%	1	92%
	2055	702	9,244	1,317%	1	93%
	2056	572	7,919	1,385%	1	93%
	2057-2061	1,691	27,512	1,627%	4	93%
	2062-2066	734	15,566	2,121%	2	93%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,207,831	1,445,009	45%
Future	1,268,067	2,704,206	213%
Lifetime	4,475,898	4,149,215	93%

Attachment 7G
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Expected Experience
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Lifetime Benefit Periods

		Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,107	597	28%	16	28%
	2004	29,423	8,770	30%	47	30%
	2005	68,978	21,002	30%	93	30%
	2006	200,220	62,365	31%	214	31%
	2007	268,437	87,675	33%	205	32%
	2008	235,531	85,366	36%	176	33%
	2009	205,134	83,500	41%	155	34%
	2010	181,631	83,091	46%	138	36%
	2011	162,206	83,514	51%	124	38%
	2012	145,459	84,315	58%	112	39%
	2013	130,664	85,409	65%	100	41%
	2014	117,295	86,576	74%	90	43%
	2015	105,189	87,792	83%	81	44%
Projected	2016	94,259	88,908	94%	73	46%
Experience	2017	84,411	89,719	106%	66	48%
	2018	75,507	90,264	120%	59	50%
	2019	67,461	90,577	134%	53	51%
	2020	60,113	90,307	150%	48	53%
	2021	53,407	89,342	167%	43	55%
	2022	47,360	87,910	186%	38	56%
	2023	41,895	85,910	205%	34	58%
	2024	36,939	83,356	226%	30	59%
	2025	32,456	80,348	248%	27	60%
	2026	28,421	76,989	271%	24	61%
	2027	24,777	73,203	295%	21	63%
	2028	21,478	68,915	321%	19	64%
	2029	18,512	64,295	347%	16	64%
	2030	15,864	59,385	374%	14	65%
	2031	13,516	54,463	403%	12	66%
	2032	11,449	49,627	433%	11	67%
	2033	9,642	44,852	465%	9	67%
	2034	8,075	40,223	498%	8	68%
	2035	6,725	35,795	532%	7	68%
	2036	5,571	31,677	569%	6	68%
	2037	4,591	27,911	608%	5	69%
	2038	3,765	24,444	649%	4	69%
	2039	3,072	21,257	692%	3	69%
	2040	2,497	18,387	736%	3	69%
	2041	2,021	15,752	780%	2	69%
	2042	1,629	13,448	826%	2	69%
	2043	1,307	11,413	873%	2	69%
	2044	1,045	9,611	920%	1	70%
	2045	832	8,062	968%	1	70%
	2046	662	6,707	1,014%	1	70%
	2047	525	5,570	1,062%	1	70%
	2048	415	4,612	1,112%	1	70%
	2049	328	3,800	1,160%	0	70%
	2050	258	3,126	1,211%	0	70%
	2051	204	2,561	1,258%	0	70%
	2052	160	2,094	1,306%	0	70%
	2053	127	1,718	1,354%	0	70%
	2054	101	1,412	1,403%	0	70%
	2055	80	1,162	1,456%	0	70%
	2056	63	960	1,511%	0	70%
	2057-2061	171	2,841	1,658%	0	70%
	2062-2066	57	1,080	1,887%	0	70%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	2,732,356	1,260,218	46%
Future	514,898	1,006,941	196%
Lifetime	3,247,254	2,267,159	70%

Attachment 7H
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with No Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,263	0	0%	15	0%
	2004	30,119	0	0%	46	0%
	2005	72,488	0	0%	98	0%
	2006	213,265	0	0%	220	0%
	2007	292,761	0	0%	220	0%
	2008	268,598	0	0%	201	0%
	2009	246,357	286,847	116%	177	23%
	2010	228,673	0	0%	169	20%
	2011	221,585	255,963	116%	166	32%
	2012	208,463	0	0%	158	28%
	2013	197,115	196,919	100%	152	34%
	2014	175,423	307,649	175%	126	43%
	2015	150,504	0	0%	120	41%
	2016	146,147	163,158	112%	117	44%
Projected Future Experience (50 Years)	2017	136,161	156,144	115%	105	47%
	2018	121,689	156,101	128%	94	50%
	2019	108,577	155,635	143%	84	52%
	2020	96,582	154,380	160%	75	54%
	2021	85,633	152,231	178%	67	56%
	2022	75,746	149,318	197%	60	59%
	2023	66,773	145,246	218%	53	60%
	2024	58,626	139,844	239%	47	62%
	2025	51,257	133,552	261%	42	64%
	2026	44,616	126,523	284%	37	65%
	2027	38,623	118,733	307%	32	67%
	2028	33,224	110,293	332%	28	68%
	2029	28,397	101,466	357%	25	69%
	2030	24,115	92,470	383%	21	70%
	2031	20,349	83,520	410%	18	71%
	2032	17,064	74,823	438%	16	72%
	2033	14,222	66,469	467%	13	72%
	2034	11,784	58,610	497%	11	73%
	2035	9,708	51,310	529%	9	73%
	2036	7,956	44,711	562%	8	73%
	2037	6,486	38,745	597%	7	74%
	2038	5,263	33,415	635%	6	74%
	2039	4,251	28,688	675%	5	74%
	2040	3,420	24,538	718%	4	74%
	2041	2,740	20,780	758%	3	75%
	2042	2,188	17,512	801%	3	75%
	2043	1,742	14,647	841%	2	75%
	2044	1,382	12,143	879%	2	75%
	2045	1,095	10,055	918%	1	75%
	2046	866	8,250	953%	1	75%
	2047	685	6,748	985%	1	75%
	2048	541	5,520	1,020%	1	75%
	2049	429	4,521	1,054%	1	75%
	2050	340	3,721	1,094%	1	75%
	2051	271	3,057	1,127%	0	75%
	2052	217	2,528	1,163%	0	75%
	2053	175	2,111	1,205%	0	75%
	2054	142	1,789	1,258%	0	75%
	2055	116	1,529	1,318%	0	75%
	2056	95	1,318	1,383%	0	75%
	2057-2061	281	4,499	1,603%	1	75%
	2062-2066	106	2,103	1,984%	0	75%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	3,377,173	1,496,673	44%
Future	817,981	1,651,982	202%
Lifetime	4,195,155	3,148,655	75%

Attachment 8A
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,685	0	0%	16	0%
	2004	35,381	0	0%	32	0%
	2005	51,965	0	0%	51	0%
	2006	121,394	0	0%	110	0%
	2007	170,289	0	0%	130	0%
	2008	172,414	0	0%	113	0%
	2009	158,717	0	0%	104	0%
	2010	150,528	0	0%	100	0%
	2011	146,533	0	0%	95	0%
	2012	138,047	0	0%	88	0%
	2013	132,170	0	0%	86	0%
	2014	122,850	0	0%	77	0%
	2015	107,557	0	0%	72	0%
	2016	102,036	20,413	20%	71	1%
Projected Future Experience (50 Years)	2017	99,314	45,822	46%	69	3%
	2018	96,263	52,290	54%	67	5%
	2019	93,257	60,734	65%	65	7%
	2020	90,214	71,210	79%	63	9%
	2021	87,130	83,687	96%	61	12%
	2022	84,000	96,519	115%	59	15%
	2023	80,827	110,834	137%	57	17%
	2024	77,615	125,848	162%	55	20%
	2025	74,367	141,403	190%	53	24%
	2026	71,087	157,921	222%	51	27%
	2027	67,779	175,378	259%	49	31%
	2028	64,448	193,070	300%	46	34%
	2029	61,101	212,682	348%	44	38%
	2030	57,749	234,598	406%	42	42%
	2031	54,403	258,210	475%	40	47%
	2032	51,073	282,650	553%	38	51%
	2033	47,765	307,716	644%	36	56%
	2034	44,490	331,621	745%	34	61%
	2035	41,263	354,458	859%	32	66%
	2036	38,101	376,411	988%	30	71%
	2037	35,017	396,073	1,131%	28	76%
	2038	32,027	412,376	1,288%	26	81%
	2039	29,145	423,847	1,454%	24	86%
	2040	26,383	432,752	1,640%	22	91%
	2041	23,754	436,791	1,839%	20	96%
	2042	21,266	433,877	2,040%	18	101%
	2043	18,925	424,656	2,244%	16	105%
	2044	16,740	410,771	2,454%	15	109%
	2045	14,719	394,676	2,681%	13	113%
	2046	12,866	376,728	2,928%	12	116%
	2047	11,186	356,346	3,186%	11	120%
	2048	9,674	334,581	3,458%	10	122%
	2049	8,322	313,424	3,766%	8	125%
	2050	7,126	293,907	4,124%	8	127%
	2051	6,087	277,233	4,554%	7	129%
	2052	5,186	261,502	5,043%	6	131%
	2053	4,413	246,161	5,579%	5	133%
	2054	3,748	232,080	6,192%	5	134%
	2055	3,181	219,084	6,888%	4	136%
	2056	2,699	206,865	7,665%	4	137%
	2057-2061	8,452	842,621	9,969%	12	142%
	2062-2066	3,588	534,950	14,908%	6	144%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	2,104,338	20,841	1%
Future	1,111,263	4,615,769	415%
Lifetime	3,215,601	4,636,611	144%

Attachment 8B
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,685	0	0%	16	0%
	2004	35,381	0	0%	32	0%
	2005	51,965	0	0%	51	0%
	2006	121,394	0	0%	110	0%
	2007	170,289	0	0%	130	0%
	2008	172,414	0	0%	113	0%
	2009	158,717	0	0%	104	0%
	2010	150,528	0	0%	100	0%
	2011	146,533	0	0%	95	0%
	2012	138,047	0	0%	88	0%
	2013	132,170	0	0%	86	0%
	2014	126,129	0	0%	77	0%
	2015	127,484	0	0%	72	0%
	2016	128,524	20,413	16%	71	1%
Projected Future Experience (50 Years)	2017	126,058	47,790	38%	69	3%
	2018	122,226	54,505	45%	67	5%
	2019	118,454	63,278	53%	65	7%
	2020	114,638	74,166	65%	63	9%
	2021	110,771	87,130	79%	61	12%
	2022	106,849	100,463	94%	59	14%
	2023	102,873	115,340	112%	57	17%
	2024	98,847	130,937	132%	55	20%
	2025	94,775	147,084	155%	53	23%
	2026	90,662	164,227	181%	51	26%
	2027	86,512	182,347	211%	49	29%
	2028	82,330	200,708	244%	46	33%
	2029	78,125	221,058	283%	44	36%
	2030	73,909	243,791	330%	42	40%
	2031	69,695	268,273	385%	40	44%
	2032	65,495	293,620	448%	38	48%
	2033	61,315	319,611	521%	36	53%
	2034	57,169	344,374	602%	34	57%
	2035	53,077	368,002	693%	32	62%
	2036	49,056	390,691	796%	30	67%
	2037	45,128	410,979	911%	28	71%
	2038	41,310	427,758	1,035%	26	76%
	2039	37,621	439,508	1,168%	24	81%
	2040	34,080	448,580	1,316%	22	86%
	2041	30,701	452,596	1,474%	20	90%
	2042	27,498	449,393	1,634%	18	94%
	2043	24,481	439,657	1,796%	16	98%
	2044	21,661	425,121	1,963%	15	102%
	2045	19,051	408,312	2,143%	13	106%
	2046	16,655	389,600	2,339%	12	109%
	2047	14,483	368,380	2,544%	11	112%
	2048	12,527	345,757	2,760%	10	114%
	2049	10,778	323,818	3,004%	8	117%
	2050	9,231	303,589	3,289%	8	119%
	2051	7,886	286,310	3,631%	7	121%
	2052	6,719	270,009	4,018%	6	122%
	2053	5,718	254,134	4,445%	5	124%
	2054	4,858	239,583	4,932%	5	125%
	2055	4,122	226,162	5,487%	4	127%
	2056	3,498	213,550	6,104%	4	128%
	2057-2061	10,956	870,187	7,942%	12	132%
	2062-2066	4,645	553,078	11,907%	6	135%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	2,156,164	20,841	1%
Future	1,418,627	4,787,844	337%
Lifetime	3,574,791	4,808,685	135%

Attachment 8D
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,685	0	0%	16	0%
	2004	35,381	0	0%	32	0%
	2005	51,965	0	0%	51	0%
	2006	121,394	0	0%	110	0%
	2007	170,289	0	0%	130	0%
	2008	172,414	0	0%	113	0%
	2009	158,717	0	0%	104	0%
	2010	150,528	0	0%	100	0%
	2011	146,533	0	0%	95	0%
	2012	138,047	0	0%	88	0%
	2013	132,170	0	0%	86	0%
	2014	122,850	0	0%	77	0%
	2015	107,557	0	0%	72	0%
	2016	102,036	20,413	20%	71	1%
Projected Future Experience (50 Years)	2017	99,314	45,822	46%	69	3%
	2018	110,502	51,435	47%	63	5%
	2019	167,548	55,172	33%	59	7%
	2020	169,152	64,091	38%	57	8%
	2021	163,368	75,109	46%	55	10%
	2022	157,500	86,386	55%	53	12%
	2023	151,551	98,926	65%	51	14%
	2024	145,528	112,026	77%	49	16%
	2025	139,438	125,544	90%	48	19%
	2026	133,288	139,860	105%	46	21%
	2027	127,085	154,941	122%	44	24%
	2028	120,840	170,163	141%	42	26%
	2029	114,565	187,015	163%	40	29%
	2030	108,280	205,827	190%	38	32%
	2031	102,006	226,077	222%	36	35%
	2032	95,762	246,995	258%	34	38%
	2033	89,559	268,412	300%	32	41%
	2034	83,418	288,774	346%	30	44%
	2035	77,369	308,171	398%	28	47%
	2036	71,439	326,774	457%	27	51%
	2037	65,657	343,367	523%	25	54%
	2038	60,051	357,038	595%	23	58%
	2039	54,646	366,524	671%	21	61%
	2040	49,469	373,800	756%	20	65%
	2041	44,539	376,884	846%	18	68%
	2042	39,873	373,991	938%	16	71%
	2043	35,485	365,690	1,031%	15	74%
	2044	31,388	353,412	1,126%	13	77%
	2045	27,599	339,277	1,229%	12	79%
	2046	24,124	323,590	1,341%	11	82%
	2047	20,975	305,857	1,458%	10	84%
	2048	18,139	286,977	1,582%	9	86%
	2049	15,605	268,658	1,722%	8	87%
	2050	13,361	251,782	1,884%	7	89%
	2051	11,413	237,374	2,080%	6	90%
	2052	9,724	223,799	2,302%	5	92%
	2053	8,274	210,581	2,545%	5	93%
	2054	7,028	198,460	2,824%	4	94%
	2055	5,963	187,286	3,141%	4	95%
	2056	5,060	176,791	3,494%	3	96%
	2057-2061	15,848	719,695	4,541%	11	99%
	2062-2066	6,728	456,595	6,787%	5	100%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	2,104,338	20,841	1%
Future	1,926,030	4,025,135	209%
Lifetime	4,030,368	4,045,977	100%

Attachment 8E
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - After Requested Rate Increase without RBO, CBUL, and Adverse Selection
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,685	0	0%	16	0%
	2004	35,381	0	0%	32	0%
	2005	51,965	0	0%	51	0%
	2006	121,394	0	0%	110	0%
	2007	170,289	0	0%	130	0%
	2008	172,414	0	0%	113	0%
	2009	158,717	0	0%	104	0%
	2010	150,528	0	0%	100	0%
	2011	146,533	0	0%	95	0%
	2012	138,047	0	0%	88	0%
	2013	132,170	0	0%	86	0%
	2014	122,850	0	0%	77	0%
	2015	107,557	0	0%	72	0%
	2016	102,036	20,413	20%	71	1%
Projected Future Experience (50 Years)	2017	99,314	45,822	46%	69	3%
	2018	117,418	52,822	45%	67	5%
	2019	203,632	64,042	31%	65	7%
	2020	207,493	75,233	36%	63	9%
	2021	200,398	88,167	44%	61	11%
	2022	193,201	101,404	52%	59	13%
	2023	185,903	116,124	62%	57	15%
	2024	178,514	131,501	74%	55	18%
	2025	171,044	147,369	86%	53	20%
	2026	163,500	164,174	100%	51	23%
	2027	155,891	181,877	117%	49	25%
	2028	148,230	199,744	135%	46	28%
	2029	140,533	219,526	156%	44	31%
	2030	132,823	241,609	182%	42	34%
	2031	125,128	265,380	212%	40	37%
	2032	117,468	289,934	247%	38	40%
	2033	109,859	315,074	287%	36	44%
	2034	102,326	338,976	331%	34	47%
	2035	94,906	361,745	381%	32	51%
	2036	87,632	383,581	438%	30	54%
	2037	80,540	403,059	500%	28	58%
	2038	73,663	419,107	569%	26	62%
	2039	67,033	430,242	642%	24	65%
	2040	60,682	438,783	723%	22	69%
	2041	54,635	442,403	810%	20	72%
	2042	48,911	439,006	898%	18	76%
	2043	43,528	429,263	986%	16	79%
	2044	38,503	414,850	1,077%	15	82%
	2045	33,855	398,258	1,176%	13	85%
	2046	29,592	379,845	1,284%	12	87%
	2047	25,729	359,028	1,395%	11	89%
	2048	22,251	336,866	1,514%	10	91%
	2049	19,142	315,362	1,648%	8	93%
	2050	16,390	295,552	1,803%	8	95%
	2051	14,001	278,640	1,990%	7	96%
	2052	11,928	262,705	2,202%	6	98%
	2053	10,149	247,189	2,436%	5	99%
	2054	8,621	232,962	2,702%	5	100%
	2055	7,315	219,844	3,005%	4	101%
	2056	6,207	207,525	3,343%	4	102%
	2057-2061	19,441	844,810	4,346%	12	105%
	2062-2066	8,253	535,972	6,494%	6	107%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	2,104,338	20,841	1%
Future	2,321,773	4,709,330	203%
Lifetime	4,426,112	4,730,171	107%

Attachment 8F
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to Proposed Increase From Inception
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Current Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	6,175	0	0%	16	0%
	2004	81,376	0	0%	32	0%
	2005	119,520	0	0%	51	0%
	2006	279,206	0	0%	110	0%
	2007	391,665	0	0%	130	0%
	2008	396,551	0	0%	113	0%
	2009	365,049	0	0%	104	0%
	2010	346,214	0	0%	100	0%
	2011	337,025	0	0%	95	0%
	2012	317,509	0	0%	88	0%
	2013	303,992	0	0%	86	0%
	2014	282,556	0	0%	77	0%
	2015	247,381	0	0%	72	0%
	2016	234,683	20,413	9%	71	0%
Projected Future Experience (50 Years)	2017	228,423	50,526	22%	69	1%
	2018	221,406	57,500	26%	67	2%
	2019	214,491	66,597	31%	65	3%
	2020	207,493	77,866	38%	63	4%
	2021	200,398	91,252	46%	61	6%
	2022	193,200	104,953	54%	59	7%
	2023	185,903	120,188	65%	57	8%
	2024	178,514	136,103	76%	55	10%
	2025	171,044	152,527	89%	53	11%
	2026	163,500	169,920	104%	51	13%
	2027	155,891	188,243	121%	49	14%
	2028	148,230	206,735	139%	46	16%
	2029	140,533	227,209	162%	44	18%
	2030	132,823	250,066	188%	42	20%
	2031	125,128	274,668	220%	40	22%
	2032	117,468	300,081	255%	38	24%
	2033	109,859	326,101	297%	36	26%
	2034	102,326	350,840	343%	34	28%
	2035	94,906	374,406	395%	32	31%
	2036	87,632	397,007	453%	30	33%
	2037	80,540	417,166	518%	28	35%
	2038	73,663	433,775	589%	26	38%
	2039	67,033	445,300	664%	24	40%
	2040	60,682	454,141	748%	22	42%
	2041	54,635	457,888	838%	20	45%
	2042	48,911	454,372	929%	18	47%
	2043	43,528	444,287	1,021%	16	49%
	2044	38,503	429,370	1,115%	15	50%
	2045	33,855	412,198	1,218%	13	52%
	2046	29,592	393,139	1,329%	12	54%
	2047	25,729	371,594	1,444%	11	55%
	2048	22,251	348,657	1,567%	10	56%
	2049	19,142	326,400	1,705%	8	58%
	2050	16,390	305,897	1,866%	8	59%
	2051	14,001	288,393	2,060%	7	60%
	2052	11,928	271,900	2,280%	6	60%
	2053	10,149	255,840	2,521%	5	61%
	2054	8,621	241,115	2,797%	5	62%
	2055	7,315	227,539	3,111%	4	63%
	2056	6,207	214,788	3,460%	4	63%
	2057-2061	19,441	874,378	4,498%	12	65%
	2062-2066	8,253	554,731	6,722%	6	66%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	4,839,977	20,841	0%
Future	2,555,904	4,880,134	191%
Lifetime	7,395,882	4,900,976	66%

Attachment 8G
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Expected Experience
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,494	332	13%	16	13%
	2004	33,711	4,931	15%	31	15%
	2005	48,022	7,627	16%	47	15%
	2006	127,934	20,268	16%	115	16%
	2007	179,860	29,943	17%	132	16%
	2008	173,318	32,149	19%	112	17%
	2009	150,093	32,398	22%	98	18%
	2010	132,635	33,354	25%	87	19%
	2011	118,483	34,724	29%	78	20%
	2012	106,291	36,405	34%	70	21%
	2013	95,491	38,306	40%	63	22%
	2014	85,910	40,470	47%	57	24%
	2015	77,342	42,838	55%	52	25%
Projected	2016	69,650	45,418	65%	47	26%
Experience	2017	62,778	48,107	77%	42	28%
	2018	56,649	50,661	89%	38	30%
	2019	51,155	53,229	104%	35	31%
	2020	46,216	55,815	121%	32	33%
	2021	41,796	58,530	140%	29	34%
	2022	37,842	61,384	162%	27	36%
	2023	34,292	64,298	188%	25	38%
	2024	31,113	67,289	216%	23	39%
	2025	28,256	70,424	249%	21	41%
	2026	25,684	73,787	287%	19	43%
	2027	23,333	76,880	329%	18	45%
	2028	21,156	79,618	376%	16	46%
	2029	19,128	81,844	428%	15	48%
	2030	17,245	83,918	487%	14	50%
	2031	15,501	85,799	554%	13	51%
	2032	13,891	87,202	628%	12	53%
	2033	12,409	88,014	709%	10	54%
	2034	11,051	88,242	798%	10	56%
	2035	9,812	88,111	898%	9	57%
	2036	8,685	87,540	1,008%	8	59%
	2037	7,664	86,343	1,127%	7	60%
	2038	6,745	84,548	1,254%	6	61%
	2039	5,919	82,212	1,389%	6	62%
	2040	5,180	79,564	1,536%	5	63%
	2041	4,523	76,620	1,694%	5	64%
	2042	3,941	73,380	1,862%	4	65%
	2043	3,427	69,871	2,039%	4	66%
	2044	2,975	66,360	2,230%	3	66%
	2045	2,579	62,978	2,442%	3	67%
	2046	2,233	59,746	2,676%	2	68%
	2047	1,932	56,745	2,938%	2	68%
	2048	1,671	53,964	3,230%	2	69%
	2049	1,444	51,406	3,559%	2	69%
	2050	1,248	49,038	3,928%	1	70%
	2051	1,079	46,837	4,340%	1	70%
	2052	933	44,755	4,798%	1	70%
	2053	806	42,634	5,290%	1	70%
	2054	696	40,472	5,818%	1	71%
	2055	600	38,368	6,396%	1	71%
	2056	516	36,400	7,050%	1	71%
	2057-2061	1,656	153,311	9,258%	2	72%
	2062-2066	707	104,139	14,734%	1	72%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	1,963,657	520,240	26%
Future	435,733	1,218,210	280%
Lifetime	2,399,391	1,738,450	72%

Attachment 8H
MedAmerica, CICA, and CLICNY
Actual and Projected Experience by Calendar Year
Nationwide Experience Restated to No Prior Rate Increase - Before Requested Rate Increase
515 Series Policy Forms Issued On or After October 1, 2003 with Inflation Protection and Lifetime Benefit Periods

		Actual or Projected Experience using Original Pricing Assumptions				Cumulative LR with Interest
		A	B	C = B / A	D	E
	Calendar Year	Earned Premium	Incurred Claims	Incurred Loss Ratio	End of Year Lives	Actual (Column C) with Max. Val. Interest
Historical Experience	1997	0	0	0%	0	0%
	1998	0	0	0%	0	0%
	1999	0	0	0%	0	0%
	2000	0	0	0%	0	0%
	2001	0	0	0%	0	0%
	2002	0	0	0%	0	0%
	2003	2,685	0	0%	16	0%
	2004	35,381	0	0%	32	0%
	2005	51,965	0	0%	51	0%
	2006	121,394	0	0%	110	0%
	2007	170,289	0	0%	130	0%
	2008	172,414	0	0%	113	0%
	2009	158,717	0	0%	104	0%
	2010	150,528	0	0%	100	0%
	2011	146,533	0	0%	95	0%
	2012	138,047	0	0%	88	0%
	2013	132,170	0	0%	86	0%
	2014	122,850	0	0%	77	0%
	2015	107,557	0	0%	72	0%
	2016	102,036	20,413	20%	71	1%
Projected Future Experience (50 Years)	2017	95,874	82,346	86%	64	4%
	2018	86,712	86,972	100%	58	8%
	2019	78,521	91,913	117%	53	11%
	2020	71,154	97,176	137%	48	14%
	2021	64,546	102,929	159%	44	17%
	2022	58,621	108,934	186%	40	20%
	2023	53,272	115,118	216%	37	22%
	2024	48,456	121,559	251%	34	25%
	2025	44,091	128,235	291%	31	28%
	2026	40,124	135,231	337%	28	31%
	2027	36,473	141,312	387%	26	34%
	2028	33,061	146,635	444%	24	37%
	2029	29,856	150,929	506%	22	39%
	2030	26,856	155,049	577%	20	42%
	2031	24,056	158,864	660%	18	45%
	2032	21,455	161,540	753%	16	47%
	2033	19,048	162,880	855%	15	50%
	2034	16,834	162,734	967%	13	52%
	2035	14,806	162,006	1,094%	12	54%
	2036	12,959	160,241	1,236%	10	56%
	2037	11,287	156,851	1,390%	9	58%
	2038	9,780	152,204	1,556%	8	60%
	2039	8,432	146,202	1,734%	7	61%
	2040	7,233	139,462	1,928%	6	63%
	2041	6,171	132,042	2,140%	6	64%
	2042	5,238	123,633	2,360%	5	66%
	2043	4,424	114,343	2,585%	4	67%
	2044	3,719	104,887	2,821%	4	68%
	2045	3,112	95,569	3,071%	3	68%
	2046	2,593	86,857	3,349%	3	69%
	2047	2,154	78,669	3,652%	2	70%
	2048	1,784	71,145	3,988%	2	70%
	2049	1,473	64,409	4,372%	2	71%
	2050	1,215	58,331	4,801%	1	71%
	2051	1,002	52,995	5,290%	1	71%
	2052	826	48,200	5,837%	1	72%
	2053	681	43,606	6,402%	1	72%
	2054	562	39,380	7,012%	1	72%
	2055	463	35,649	7,699%	1	72%
	2056	381	32,241	8,458%	1	72%
	2057-2061	1,090	118,093	10,839%	2	73%
	2062-2066	370	60,580	16,357%	1	73%

With Interest Accum./Disc. To 12/31/2016 at Max. Val. Interest

History	2,210,686	20,917	1%
Future	668,407	2,086,538	312%
Lifetime	2,879,093	2,107,455	73%

Attachment 9-a
MedAmerica, CICA, and CLICNY
Nationwide Experience Underlying Attachment C-1 of the August 31 Note to Filer
Persistency Assumption Reflects Policyholder Behavior due to the Rate Increase
515 Series Issued Prior to October 1, 2003

		Without Interest			With Interest at Maximum Valuation Interest Rate		
		A	B	C	D	E	F
	Calendar Year	Initial Premium	Initial Premium with Requested Increases	Incurred Claims	Initial Premium	Initial Premium with Requested Increases	Incurred Claims
Historical Experience	1997	1,404	1,404	0	3,313	3,313	0
	1998	365,019	365,019	0	824,076	824,076	0
	1999	1,713,969	1,713,969	43,198	3,702,867	3,702,867	93,326
	2000	3,837,579	3,837,579	190,025	7,933,707	7,933,707	392,854
	2001	5,769,329	5,769,329	263,180	11,413,736	11,413,736	520,662
	2002	8,061,447	8,061,447	587,804	15,261,569	15,261,569	1,112,804
	2003	8,910,343	8,910,343	266,048	16,142,260	16,142,260	481,982
	2004	8,524,103	8,524,103	1,042,726	14,777,547	14,777,547	1,807,689
	2005	8,041,937	8,041,937	2,812,365	13,341,296	13,341,296	4,665,616
	2006	7,698,185	7,698,185	2,413,155	12,221,075	12,221,075	3,830,948
	2007	7,348,650	7,348,650	1,365,196	11,163,807	11,163,807	2,073,957
	2008	7,047,600	7,047,600	2,161,777	10,245,418	10,245,418	3,142,674
	2009	6,687,010	6,687,010	3,030,523	9,302,596	9,302,596	4,215,895
	2010	6,321,297	6,321,297	2,907,853	8,415,154	8,415,154	3,871,046
	2011	6,000,132	6,000,132	4,740,426	7,643,643	7,643,643	6,038,888
	2012	5,725,088	5,725,088	3,500,486	6,979,198	6,979,198	4,267,286
	2013	5,434,346	5,434,346	4,778,688	6,339,490	6,339,490	5,574,625
	2014	5,070,187	5,070,187	4,716,557	5,659,977	5,659,977	5,265,211
	2015	4,542,713	4,542,713	4,370,266	4,852,771	4,852,771	4,668,553
	2016	4,157,007	4,157,007	6,178,344	4,249,510	4,249,510	6,315,827
Projected Future Experience (50 Years)	2017	3,873,137	3,873,137	5,345,096	3,788,826	3,788,826	5,228,744
	2018	3,554,729	3,872,894	5,714,795	3,327,607	3,625,443	5,349,661
	2019	2,997,394	5,015,553	5,752,347	2,685,055	4,492,914	5,152,931
	2020	2,711,387	4,895,033	5,964,278	2,324,259	4,196,127	5,112,707
	2021	2,485,581	4,521,011	6,185,046	2,038,941	3,708,619	5,073,640
	2022	2,266,643	4,154,859	6,388,193	1,779,277	3,261,495	5,014,625
	2023	2,055,768	3,798,576	6,583,101	1,544,252	2,853,415	4,945,095
	2024	1,854,012	3,454,031	6,758,583	1,332,724	2,482,870	4,858,290
	2025	1,662,356	3,123,070	6,914,732	1,143,498	2,148,292	4,756,493
	2026	1,481,656	2,807,421	7,028,137	975,310	1,848,003	4,626,318
	2027	1,312,602	2,508,660	7,072,073	826,822	1,580,231	4,454,774
	2028	1,155,757	2,228,224	7,050,368	696,673	1,343,141	4,249,858
	2029	1,011,503	1,967,301	6,956,012	583,463	1,134,794	4,012,423
	2030	880,095	1,726,874	6,785,384	485,802	953,215	3,745,454
	2031	761,492	1,507,412	6,556,136	402,234	796,243	3,463,074
	2032	655,261	1,308,613	6,326,005	331,216	661,468	3,197,621
	2033	560,676	1,129,611	6,113,023	271,202	546,399	2,956,904
	2034	477,087	969,654	5,883,509	220,832	448,830	2,723,337
	2035	403,876	828,005	5,634,107	178,894	366,760	2,495,593
	2036	340,303	703,646	5,368,794	144,244	298,254	2,275,669
	2037	285,493	595,244	5,083,580	115,801	241,441	2,061,986
	2038	238,546	501,355	4,786,714	92,592	194,601	1,857,964
	2039	198,537	420,468	4,487,532	73,744	156,177	1,666,829
	2040	164,623	351,179	4,183,372	58,514	124,823	1,486,941
	2041	136,035	292,175	3,879,107	46,270	99,379	1,319,419
	2042	112,024	242,138	3,572,655	36,463	78,813	1,162,855
	2043	91,948	199,905	3,267,440	28,639	62,265	1,017,714
	2044	75,250	164,448	2,973,276	22,429	49,015	886,211
	2045	61,381	134,782	2,689,208	17,507	38,443	767,026
	2046	49,909	110,057	2,419,532	13,622	30,039	660,390
	2047	40,473	89,591	2,165,865	10,571	23,400	565,698
	2048	32,723	72,687	1,928,591	8,179	18,167	482,033
	2049	26,391	58,799	1,709,566	6,312	14,064	408,890
	2050	21,252	47,475	1,508,117	4,864	10,866	345,175
	2051	17,075	38,228	1,320,949	3,740	8,373	289,317
	2052	13,691	30,708	1,146,255	2,869	6,436	240,244
	2053	10,954	24,613	988,815	2,197	4,936	198,322
	2054	8,743	19,674	847,831	1,678	3,776	162,723
	2055	6,967	15,700	725,118	1,280	2,883	133,178
	2056	5,542	12,509	618,952	974	2,198	108,784
	2057	4,398	9,940	525,152	740	1,672	88,323
	2058	3,482	7,878	443,924	560	1,268	71,447
	2059	2,754	6,237	373,136	424	961	57,468
	2060	2,178	4,938	312,410	321	728	46,043
	2061	1,720	3,902	261,079	243	550	36,821
	2062	1,357	3,082	217,576	183	416	29,364
	2063	1,070	2,431	181,737	138	314	23,471
	2064	839	1,909	150,328	104	236	18,579
	2065	656	1,494	122,946	78	177	14,540
	2066	511	1,166	99,776	58	132	11,292
History		111,257,347	111,257,347	45,368,617	170,473,010	170,473,010	58,339,841
Future		34,117,836	57,858,292	179,370,259	25,632,226	41,711,888	99,912,258
Lifetime		145,375,183	169,115,639	224,738,877	196,105,237	212,184,898	158,252,099

Attachment 9-b
MedAmerica, CICA, and CLICNY
Nationwide Experience Underlying Attachment C-2 of the August 31 Note to Filer
Persistency Assumption Reflects Policyholder Behavior due to the Rate Increase
515 Series with No Inflation Protection Issued Prior to October 1, 2003

		Without Interest			With Interest at Maximum Valuation Interest Rate		
		A	B	C	D	E	F
	Calendar Year	Initial Premium	Initial Premium with Requested Increases	Incurred Claims	Initial Premium	Initial Premium with Requested Increases	Incurred Claims
Historical Experience	1997	860	860	0	2,029	2,029	0
	1998	204,780	204,780	0	462,315	462,315	0
	1999	968,043	968,043	43,198	2,091,365	2,091,365	93,326
	2000	1,947,084	1,947,084	23,819	4,025,349	4,025,349	49,242
	2001	2,680,474	2,680,474	117,347	5,302,908	5,302,908	232,154
	2002	3,665,138	3,665,138	414,476	6,938,675	6,938,675	784,667
	2003	4,003,381	4,003,381	80,217	7,252,652	7,252,652	145,323
	2004	3,828,217	3,828,217	496,384	6,636,669	6,636,669	860,541
	2005	3,625,087	3,625,087	1,355,694	6,013,893	6,013,893	2,249,049
	2006	3,464,021	3,464,021	1,552,824	5,499,226	5,499,226	2,465,149
	2007	3,273,327	3,273,327	663,842	4,972,721	4,972,721	1,008,485
	2008	3,110,866	3,110,866	1,315,063	4,522,408	4,522,408	1,911,768
	2009	2,922,812	2,922,812	1,351,255	4,066,053	4,066,053	1,879,791
	2010	2,733,511	2,733,511	1,503,718	3,638,956	3,638,956	2,001,808
	2011	2,562,112	2,562,112	2,445,740	3,263,907	3,263,907	3,115,658
	2012	2,407,365	2,407,365	1,481,125	2,934,710	2,934,710	1,805,573
	2013	2,231,812	2,231,812	2,212,089	2,603,542	2,603,542	2,580,534
	2014	2,023,300	2,023,300	2,437,304	2,258,661	2,258,661	2,720,823
	2015	1,735,587	1,735,587	2,244,635	1,854,048	1,854,048	2,397,839
	2016	1,529,904	1,529,904	2,800,736	1,563,948	1,563,948	2,863,059
Projected Future Experience (50 Years)	2017	1,395,416	1,395,416	2,106,504	1,365,041	1,365,041	2,060,649
	2018	1,270,393	1,270,393	2,152,265	1,189,224	1,189,224	2,014,750
	2019	1,148,809	1,148,809	2,163,516	1,029,098	1,029,098	1,938,070
	2020	1,031,659	1,031,659	2,132,629	884,360	884,360	1,828,135
	2021	919,867	919,867	2,071,032	754,573	754,573	1,698,883
	2022	814,169	814,169	1,993,833	639,109	639,109	1,565,126
	2023	715,146	715,146	1,905,698	537,204	537,204	1,431,523
	2024	623,229	623,229	1,806,374	447,997	447,997	1,298,481
	2025	538,730	538,730	1,699,978	370,581	370,581	1,169,378
	2026	461,837	461,837	1,583,367	304,007	304,007	1,042,262
	2027	392,559	392,559	1,453,620	247,277	247,277	915,651
	2028	330,783	330,783	1,315,576	199,391	199,391	793,010
	2029	276,273	276,273	1,173,734	159,362	159,362	677,042
	2030	228,727	228,727	1,030,822	126,255	126,255	569,002
	2031	187,707	187,707	890,638	99,150	99,150	470,452
	2032	152,682	152,682	761,970	77,177	77,177	385,155
	2033	123,035	123,035	647,981	59,513	59,513	313,432
	2034	98,190	98,190	544,945	45,450	45,450	252,242
	2035	77,622	77,622	453,638	34,382	34,382	200,936
	2036	60,809	60,809	373,929	25,775	25,775	158,497
	2037	47,223	47,223	305,231	19,155	19,155	123,807
	2038	36,386	36,386	247,189	14,123	14,123	95,947
	2039	27,820	27,820	198,992	10,333	10,333	73,913
	2040	21,118	21,118	159,763	7,506	7,506	56,786
	2041	15,927	15,927	127,913	5,417	5,417	43,508
	2042	11,937	11,937	101,811	3,885	3,885	33,138
	2043	8,904	8,904	80,725	2,773	2,773	25,143
	2044	6,636	6,636	63,987	1,978	1,978	19,072
	2045	4,920	4,920	50,820	1,403	1,403	14,495
	2046	3,641	3,641	40,374	994	994	11,020
	2047	2,690	2,690	31,816	703	703	8,310
	2048	1,982	1,982	24,892	495	495	6,221
	2049	1,461	1,461	19,277	349	349	4,611
	2050	1,081	1,081	14,870	247	247	3,403
	2051	804	804	11,474	176	176	2,513
	2052	601	601	8,864	126	126	1,858
	2053	448	448	6,797	90	90	1,363
	2054	334	334	5,173	64	64	993
	2055	249	249	3,965	46	46	728
	2056	184	184	3,073	32	32	540
	2057	135	135	2,403	23	23	404
	2058	100	100	1,877	16	16	302
	2059	74	74	1,474	11	11	227
	2060	55	55	1,169	8	8	172
	2061	41	41	934	6	6	132
	2062	30	30	743	4	4	100
	2063	22	22	562	3	3	73
	2064	16	16	417	2	2	52
	2065	11	11	311	1	1	37
	2066	8	8	229	1	1	26
History		48,917,680	48,917,680	22,539,466	75,904,035	75,904,035	29,164,790
Future		11,042,480	11,042,480	29,779,177	8,664,899	8,664,899	21,311,570
Lifetime		59,960,160	59,960,160	52,318,643	84,568,933	84,568,933	50,476,360

Attachment 9-c
MedAmerica, CICA, and CLICNY
Nationwide Experience Underlying Attachment C-3 of the August 31 Note to Filer
Persistency Assumption Reflects Policyholder Behavior due to the Rate Increase
515 Series with Inflation Protection Issued Prior to October 1, 2003

		Without Interest			With Interest at Maximum Valuation Interest Rate		
		A	B	C	D	E	F
	Calendar Year	Initial Premium	Initial Premium with Requested Increases	Incurred Claims	Initial Premium	Initial Premium with Requested Increases	Incurred Claims
Historical Experience	1997	544	544	0	1,284	1,284	0
	1998	160,240	160,240	0	361,761	361,761	0
	1999	745,926	745,926	0	1,611,502	1,611,502	0
	2000	1,890,495	1,890,495	166,207	3,908,358	3,908,358	343,611
	2001	3,088,855	3,088,855	145,833	6,110,828	6,110,828	288,508
	2002	4,396,309	4,396,309	173,328	8,322,895	8,322,895	328,137
	2003	4,906,962	4,906,962	185,832	8,889,609	8,889,609	336,658
	2004	4,695,886	4,695,886	546,341	8,140,877	8,140,877	947,148
	2005	4,416,850	4,416,850	1,456,671	7,327,402	7,327,402	2,416,567
	2006	4,234,164	4,234,164	860,331	6,721,849	6,721,849	1,365,798
	2007	4,075,323	4,075,323	701,354	6,191,085	6,191,085	1,065,472
	2008	3,936,734	3,936,734	846,713	5,723,010	5,723,010	1,230,906
	2009	3,764,199	3,764,199	1,679,268	5,236,543	5,236,543	2,336,104
	2010	3,587,786	3,587,786	1,404,135	4,776,198	4,776,198	1,869,239
	2011	3,438,020	3,438,020	2,294,686	4,379,736	4,379,736	2,923,229
	2012	3,317,724	3,317,724	2,019,361	4,044,488	4,044,488	2,461,712
	2013	3,202,534	3,202,534	2,566,599	3,735,948	3,735,948	2,994,091
	2014	3,046,887	3,046,887	2,279,253	3,401,317	3,401,317	2,544,388
	2015	2,807,126	2,807,126	2,125,631	2,998,723	2,998,723	2,270,713
	2016	2,627,103	2,627,103	3,377,608	2,685,563	2,685,563	3,452,768
Projected Future Experience (50 Years)	2017	2,477,721	2,477,721	3,238,592	2,423,785	2,423,785	3,168,095
	2018	2,284,335	2,602,501	3,562,531	2,138,383	2,436,219	3,334,910
	2019	1,848,586	3,866,744	3,588,831	1,655,956	3,463,815	3,214,861
	2020	1,679,727	3,863,373	3,831,649	1,439,898	3,311,766	3,284,571
	2021	1,565,715	3,601,144	4,114,014	1,284,368	2,954,046	3,374,756
	2022	1,452,474	3,340,690	4,394,360	1,140,167	2,622,385	3,449,499
	2023	1,340,622	3,083,430	4,677,402	1,007,048	2,316,212	3,513,572
	2024	1,230,783	2,830,802	4,952,209	884,727	2,034,873	3,559,809
	2025	1,123,626	2,584,340	5,214,754	772,918	1,777,711	3,587,116
	2026	1,019,819	2,345,583	5,444,770	671,302	1,543,996	3,584,056
	2027	920,044	2,116,101	5,618,452	579,545	1,332,954	3,539,123
	2028	824,974	1,897,441	5,734,792	497,282	1,143,749	3,456,848
	2029	735,229	1,691,028	5,782,278	424,101	975,432	3,335,380
	2030	651,368	1,498,147	5,754,562	359,548	826,960	3,176,453
	2031	573,785	1,319,705	5,665,497	303,084	697,093	2,992,622
	2032	502,579	1,155,931	5,564,035	254,040	584,291	2,812,467
	2033	437,642	1,006,576	5,465,042	211,690	486,887	2,643,472
	2034	378,898	871,465	5,338,565	175,383	403,380	2,471,095
	2035	326,253	750,383	5,180,469	144,512	332,377	2,294,657
	2036	279,494	642,837	4,994,864	118,469	272,479	2,117,172
	2037	238,270	548,021	4,778,349	96,646	222,286	1,938,179
	2038	202,160	464,969	4,539,525	78,469	180,478	1,762,017
	2039	170,717	392,648	4,288,541	63,410	145,843	1,592,916
	2040	143,505	330,061	4,023,609	51,007	117,317	1,430,154
	2041	120,108	276,248	3,751,194	40,853	93,962	1,275,911
	2042	100,088	230,201	3,470,844	32,577	74,928	1,129,717
	2043	83,044	191,001	3,186,715	25,866	59,491	992,571
	2044	68,614	157,812	2,909,289	20,451	47,037	867,139
	2045	56,462	129,862	2,638,388	16,104	37,040	752,531
	2046	46,268	106,416	2,379,158	12,628	29,045	649,371
	2047	37,783	86,901	2,134,049	9,868	22,697	557,388
	2048	30,741	70,705	1,903,700	7,683	17,672	475,812
	2049	24,930	57,338	1,690,288	5,963	13,714	404,279
	2050	20,171	46,394	1,493,247	4,617	10,619	341,771
	2051	16,271	37,423	1,309,475	3,564	8,197	286,804
	2052	13,090	30,107	1,137,391	2,744	6,310	238,386
	2053	10,506	24,165	982,018	2,107	4,847	196,958
	2054	8,409	19,340	842,658	1,614	3,712	161,730
	2055	6,718	15,451	721,153	1,234	2,838	132,449
	2056	5,358	12,325	615,880	942	2,166	108,244
	2057	4,263	9,804	522,749	717	1,649	87,919
	2058	3,382	7,777	442,047	544	1,252	71,145
	2059	2,679	6,163	371,663	413	949	57,241
	2060	2,123	4,882	311,240	313	720	45,871
	2061	1,679	3,861	260,144	237	545	36,689
	2062	1,327	3,051	216,833	179	412	29,264
	2063	1,047	2,409	181,176	135	311	23,399
	2064	823	1,893	149,911	102	234	18,527
	2065	645	1,483	122,635	76	175	14,504
	2066	503	1,158	99,547	57	131	11,266
History		62,339,667	62,339,667	22,829,152	94,568,976	94,568,976	29,175,051
Future		23,075,356	46,815,812	149,591,082	16,967,327	33,046,989	78,600,688
Lifetime		85,415,023	109,155,479	172,420,234	111,536,303	127,615,965	107,775,739

Attachment 10-a
Demonstration that the Requested Cumulative Rate Increase Passes the 60%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	19,930,797	x	60%	=	11,997,890
2a	Accumulated value of earned premium	19,930,797				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	7,176,161	x	60%	=	4,319,887
4a	Present value of future projected premium	10,624,140				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	3,447,979	x	85%	=	2,930,782
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**19,248,560**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					4,215,947
6b	Present value of future projected incurred claims without the inclusion of active life reserves					19,704,336
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**23,920,283**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment 10-b
Demonstration that the Requested Cumulative Rate Increase Passes the 61%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with No Inflation Protection Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	10,967,226	x	61%	=	6,635,380
2a	Accumulated value of earned premium	10,967,226				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	3,757,508	x	61%	=	2,273,364
4a	Present value of future projected premium	3,757,508				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	0	x	85%	=	0
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**8,908,744**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					2,742,421
6b	Present value of future projected incurred claims without the inclusion of active life reserves					7,661,962
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**10,404,383**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment 10-c
Demonstration that the Requested Cumulative Rate Increase Passes the 60%/85% Loss Ratio Minimum
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with Inflation Protection Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	8,963,570	x	60%	=	5,363,599
2a	Accumulated value of earned premium	8,963,570				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	0	x	85%	=	0
3	Present value of future projected initial earned premium	3,417,290	x	60%	=	2,044,829
4a	Present value of future projected premium	6,866,632				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	3,449,342	x	85%	=	2,931,941
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**10,340,369**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					1,473,526
6b	Present value of future projected incurred claims without the inclusion of active life reserves					12,042,374
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**13,515,900**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Future projected initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment 11-a
MedAmerica, CICA, and CLICNY
Nationwide Experience Underlying Attachment 10-a
Persistency Assumption Reflects Policyholder Behavior due to the Rate Increase
515 Series Issued On or After October 1, 2003

		Without Interest			With Interest at Maximum Valuation Interest Rate		
		A	B	C	D	E	F
	Calendar Year	Initial Premium	Initial Premium with Requested Increases	Incurred Claims[1]	Initial Premium	Initial Premium with Requested Increases	Incurred Claims[1]
Historical Experience	1997	0	0	0	0	0	0
	1998	0	0	0	0	0	0
	1999	0	0	0	0	0	0
	2000	0	0	0	0	0	0
	2001	0	0	0	0	0	0
	2002	0	0	0	0	0	0
	2003	25,384	25,384	0	45,987	45,987	0
	2004	355,482	355,482	0	616,270	616,270	0
	2005	662,091	662,091	441	1,098,386	1,098,386	731
	2006	1,322,273	1,322,273	459	2,066,220	2,066,220	729
	2007	1,665,830	1,665,830	127,269	2,473,775	2,473,775	186,967
	2008	1,620,254	1,620,254	0	2,306,475	2,306,475	0
	2009	1,485,215	1,485,215	637,174	2,029,256	2,029,256	862,401
	2010	1,377,454	1,377,454	302,350	1,805,465	1,805,465	402,500
	2011	1,291,858	1,291,858	511,546	1,623,973	1,623,973	651,126
	2012	1,216,126	1,216,126	215,138	1,466,265	1,466,265	259,141
	2013	1,146,403	1,146,403	291,519	1,325,988	1,325,988	335,879
	2014	1,057,018	1,057,018	506,765	1,172,886	1,172,886	564,485
	2015	939,041	939,041	465,516	999,532	999,532	494,381
	2016	881,803	881,803	448,297	900,320	900,320	457,608
Projected Future Experience (50 Years)	2017	850,397	850,397	545,927	832,913	832,913	534,616
	2018	803,869	864,074	600,435	755,313	811,895	563,859
	2019	715,871	1,071,345	651,163	645,285	965,872	586,379
	2020	673,045	1,060,180	728,532	582,036	917,100	629,148
	2021	637,973	1,007,985	815,068	529,313	836,627	675,066
	2022	602,309	954,804	901,099	479,459	760,411	715,860
	2023	566,228	900,863	985,984	432,477	688,442	751,468
	2024	529,939	846,433	1,059,380	388,382	620,718	774,664
	2025	493,697	791,875	1,122,131	347,197	557,278	787,247
	2026	457,708	737,474	1,178,684	308,896	498,082	793,381
	2027	422,151	683,476	1,233,356	273,418	443,039	796,476
	2028	387,228	630,152	1,283,316	240,708	392,065	795,150
	2029	353,167	577,818	1,333,616	210,718	345,088	792,959
	2030	320,182	526,779	1,379,723	183,380	302,016	787,424
	2031	288,480	477,351	1,413,848	158,613	262,748	774,546
	2032	258,224	429,821	1,442,802	136,310	227,157	758,926
	2033	229,553	384,442	1,461,339	116,348	195,095	738,325
	2034	202,643	341,523	1,460,543	98,625	166,437	708,864
	2035	177,673	301,388	1,442,362	83,041	141,061	672,477
	2036	154,747	264,259	1,407,883	69,463	118,797	630,556
	2037	133,913	230,265	1,366,092	57,736	99,433	587,787
	2038	115,163	199,447	1,316,308	47,693	82,736	544,157
	2039	98,454	171,774	1,261,005	39,167	68,457	500,887
	2040	83,704	147,160	1,201,337	31,990	56,347	458,576
	2041	70,786	125,436	1,135,147	25,991	46,147	416,406
	2042	59,552	106,394	1,062,541	21,008	37,611	374,588
	2043	49,844	89,803	984,958	16,895	30,505	333,731
	2044	41,508	75,438	907,284	13,519	24,624	295,462
	2045	34,407	63,092	831,418	10,767	19,789	260,261
	2046	28,392	52,542	757,391	8,537	15,836	227,884
	2047	23,337	43,597	686,056	6,742	12,625	198,382
	2048	19,118	36,057	618,743	5,306	10,031	171,941
	2049	15,601	29,715	557,215	4,159	7,941	148,800
	2050	12,693	24,413	502,787	3,250	6,266	129,006
	2051	10,327	20,056	456,227	2,539	4,943	112,463
	2052	8,395	16,463	415,080	1,982	3,895	98,257
	2053	6,831	13,520	377,705	1,548	3,069	85,836
	2054	5,569	11,117	345,252	1,211	2,421	75,317
	2055	4,546	9,148	316,666	948	1,911	66,325
	2056	3,722	7,543	291,049	745	1,511	58,526
	2057	3,056	6,230	267,664	586	1,196	51,647
	2058	2,517	5,154	243,708	463	949	45,119
	2059	2,076	4,266	220,608	366	752	39,190
	2060	1,716	3,532	199,759	290	597	34,041
	2061	1,421	2,928	180,159	230	474	29,434
	2062	1,179	2,429	162,098	183	376	25,377
	2063	974	2,005	144,544	144	298	21,675
	2064	804	1,652	126,570	114	235	18,186
	2065	660	1,353	109,964	90	184	15,140
	2066	540	1,102	95,049	70	144	12,542

History	15,046,232	15,046,232	3,506,473	19,930,797	19,930,797	4,215,947
Future	9,965,889	15,206,068	39,587,571	7,176,161	10,624,140	19,704,336
Lifetime	25,012,121	30,252,300	43,094,044	27,106,958	30,554,937	23,920,283

[1] Future incurred claims are increased by 15% to reflect assumptions for moderately adverse conditions.

Attachment 11-b
MedAmerica, CICA, and CLICNY
Nationwide Experience Underlying Attachment 10-b
Persistency Assumption Reflects Policyholder Behavior due to the Rate Increase
515 Series with No Inflation Protection Issued On or After October 1, 2003

		Without Interest			With Interest at Maximum Valuation Interest Rate		
		A	B	C	D	E	F
	Calendar Year	Initial Premium	Initial Premium with Requested Increases	Incurred Claims[1]	Initial Premium	Initial Premium with Requested Increases	Incurred Claims[1]
Historical Experience	1997	0	0	0	0	0	0
	1998	0	0	0	0	0	0
	1999	0	0	0	0	0	0
	2000	0	0	0	0	0	0
	2001	0	0	0	0	0	0
	2002	0	0	0	0	0	0
	2003	11,467	11,467	0	20,774	20,774	0
	2004	169,696	169,696	0	294,188	294,188	0
	2005	352,261	352,261	0	584,389	584,389	0
	2006	781,816	781,816	0	1,221,427	1,221,427	0
	2007	943,376	943,376	32,744	1,402,273	1,402,273	49,744
	2008	898,447	898,447	0	1,280,316	1,280,316	0
	2009	824,542	824,542	545,718	1,127,753	1,127,753	739,667
	2010	759,931	759,931	115,552	996,952	996,952	153,827
	2011	709,870	709,870	259,017	893,001	893,001	329,426
	2012	669,364	669,364	104,261	807,571	807,571	126,757
	2013	627,518	627,518	291,519	726,192	726,192	335,879
	2014	564,575	564,575	506,765	626,714	626,714	564,485
	2015	487,004	487,004	63,364	518,552	518,552	67,689
	2016	457,457	457,457	367,345	467,125	467,125	374,947
Projected Future Experience (50 Years)	2017	438,546	438,546	340,887	429,469	429,469	333,803
	2018	417,880	417,880	369,343	392,473	392,473	346,776
	2019	396,781	396,781	404,752	357,408	357,408	364,368
	2020	375,249	375,249	444,637	324,190	324,190	383,821
	2021	353,349	353,349	484,639	292,797	292,797	401,185
	2022	331,160	331,160	520,428	263,209	263,209	413,183
	2023	308,816	308,816	551,340	235,442	235,442	419,892
	2024	286,482	286,482	570,191	209,518	209,518	416,587
	2025	264,330	264,330	579,928	185,453	185,453	406,459
	2026	242,503	242,503	583,193	163,227	163,227	392,133
	2027	221,132	221,132	582,085	142,803	142,803	375,460
	2028	200,363	200,363	577,644	124,149	124,149	357,436
	2029	180,358	180,358	571,902	107,233	107,233	339,532
	2030	161,261	161,261	561,043	92,006	92,006	319,628
	2031	143,194	143,194	544,033	78,403	78,403	297,425
	2032	126,227	126,227	525,158	66,330	66,330	275,564
	2033	110,407	110,407	502,966	55,683	55,683	253,348
	2034	95,812	95,812	473,674	46,381	46,381	229,027
	2035	82,507	82,507	440,288	38,337	38,337	204,337
	2036	70,508	70,508	403,982	31,448	31,448	179,959
	2037	59,797	59,797	367,387	25,602	25,602	157,077
	2038	50,330	50,330	331,193	20,686	20,686	135,894
	2039	42,053	42,053	296,738	16,592	16,592	116,848
	2040	34,892	34,892	263,927	13,215	13,215	99,742
	2041	28,747	28,747	232,037	10,452	10,452	84,160
	2042	23,519	23,519	202,099	8,209	8,209	70,355
	2043	19,106	19,106	174,616	6,401	6,401	58,344
	2044	15,409	15,409	149,572	4,955	4,955	47,973
	2045	12,341	12,341	127,020	3,810	3,810	39,114
	2046	9,815	9,815	105,992	2,908	2,908	31,337
	2047	7,753	7,753	87,660	2,205	2,205	24,891
	2048	6,088	6,088	71,734	1,662	1,662	19,568
	2049	4,745	4,745	57,854	1,243	1,243	15,169
	2050	3,677	3,677	46,446	925	925	11,709
	2051	2,843	2,843	36,869	686	686	8,938
	2052	2,189	2,189	29,150	507	507	6,797
	2053	1,686	1,686	23,114	375	375	5,186
	2054	1,301	1,301	18,494	278	278	3,993
	2055	1,007	1,007	15,016	206	206	3,119
	2056	784	784	12,208	154	154	2,436
	2057	615	615	10,054	116	116	1,926
	2058	488	488	8,447	88	88	1,552
	2059	392	392	7,262	68	68	1,278
	2060	319	319	6,323	53	53	1,064
	2061	262	262	5,556	42	42	892
	2062	218	218	4,922	33	33	753
	2063	181	181	4,283	26	26	626
	2064	152	152	3,754	21	21	524
	2065	128	128	3,217	17	17	428
	2066	107	107	2,728	14	14	345

History	8,257,323	8,257,323	2,286,284	10,967,226	10,967,226	2,742,421
Future	5,137,805	5,137,805	12,737,783	3,757,508	3,757,508	7,661,962
Lifetime	13,395,128	13,395,128	15,024,067	14,724,734	14,724,734	10,404,383

[1] Future incurred claims are increased by 15% to reflect assumptions for moderately adverse conditions.

Attachment 11-c
MedAmerica, CICA, and CLICNY
Nationwide Experience Underlying Attachment 10-c
Persistency Assumption Reflects Policyholder Behavior due to the Rate Increase
515 Series with Inflation Protection Issued On or After October 1, 2003

		Without Interest			With Interest at Maximum Valuation Interest Rate		
		A	B	C	D	E	F
	Calendar Year	Initial Premium	Initial Premium with Requested Increases	Incurred Claims[1]	Initial Premium	Initial Premium with Requested Increases	Incurred Claims[1]
Historical Experience	1997	0	0	0	0	0	0
	1998	0	0	0	0	0	0
	1999	0	0	0	0	0	0
	2000	0	0	0	0	0	0
	2001	0	0	0	0	0	0
	2002	0	0	0	0	0	0
	2003	13,917	13,917	0	25,213	25,213	0
	2004	185,786	185,786	0	322,082	322,082	0
	2005	309,830	309,830	441	513,997	513,997	731
	2006	540,457	540,457	459	844,794	844,794	729
	2007	722,453	722,453	94,525	1,071,501	1,071,501	137,223
	2008	721,807	721,807	0	1,026,158	1,026,158	0
	2009	660,674	660,674	91,456	901,503	901,503	122,733
	2010	617,524	617,524	186,798	808,513	808,513	248,673
	2011	581,988	581,988	252,529	730,972	730,972	321,700
	2012	546,762	546,762	110,877	658,694	658,694	132,384
	2013	518,886	518,886	0	599,796	599,796	0
	2014	492,443	492,443	0	546,172	546,172	0
	2015	452,037	452,037	402,152	480,980	480,980	426,692
	2016	424,347	424,347	80,952	433,195	433,195	82,661
Projected Future Experience (50 Years)	2017	411,851	411,851	205,039	403,444	403,444	200,813
	2018	385,990	446,195	231,093	362,835	419,422	217,083
	2019	319,090	674,563	246,412	287,836	608,464	222,011
	2020	297,796	684,930	283,896	257,787	592,910	245,327
	2021	284,624	654,636	330,429	236,448	543,830	273,881
	2022	271,150	623,644	380,671	216,175	497,202	302,677
	2023	257,412	592,047	434,644	196,957	453,000	331,576
	2024	243,457	559,951	489,189	178,783	411,200	358,078
	2025	229,367	527,544	542,203	161,663	371,826	380,789
	2026	215,205	494,971	595,491	145,589	334,855	401,248
	2027	201,019	462,345	651,271	130,537	300,236	421,017
	2028	186,865	429,789	705,672	116,485	267,916	437,714
	2029	172,809	397,460	761,714	103,415	237,855	453,427
	2030	158,921	365,518	818,680	91,309	210,010	467,796
	2031	145,286	334,158	869,815	80,150	184,345	477,121
	2032	131,997	303,594	917,644	69,925	160,827	483,362
	2033	119,146	274,035	958,372	60,614	139,412	484,978
	2034	106,831	245,711	986,869	52,198	120,056	479,837
	2035	95,166	218,881	1,002,075	44,663	102,725	468,139
	2036	84,240	193,751	1,003,900	37,978	87,349	450,597
	2037	74,116	170,468	998,704	32,101	73,831	430,711
	2038	64,833	149,117	985,114	26,978	62,050	408,262
	2039	56,401	129,721	964,267	22,550	51,865	384,039
	2040	48,813	112,269	937,410	18,753	43,131	358,834
	2041	42,039	96,689	903,109	15,520	35,696	332,245
	2042	36,033	82,875	860,442	12,783	29,402	304,233
	2043	30,738	70,697	810,342	10,480	24,104	275,386
	2044	26,100	60,030	757,712	8,552	19,669	247,489
	2045	22,066	50,751	704,398	6,948	15,979	221,147
	2046	18,577	42,727	651,399	5,621	12,927	196,547
	2047	15,584	35,844	598,395	4,530	10,420	173,491
	2048	13,030	29,970	547,010	3,639	8,369	152,373
	2049	10,857	24,970	499,361	2,912	6,698	133,631
	2050	9,016	20,736	456,341	2,322	5,341	117,297
	2051	7,484	17,213	419,357	1,851	4,256	103,525
	2052	6,206	14,273	385,930	1,473	3,387	91,459
	2053	5,145	11,834	354,591	1,171	2,694	80,650
	2054	4,268	9,816	326,757	932	2,143	71,324
	2055	3,540	8,141	301,650	741	1,705	63,206
	2056	2,939	6,759	278,841	590	1,357	56,090
	2057	2,441	5,615	257,610	470	1,080	49,722
	2058	2,028	4,665	235,261	374	860	43,567
	2059	1,684	3,874	213,347	298	684	37,912
	2060	1,397	3,213	193,436	236	544	32,977
	2061	1,159	2,666	174,603	188	432	28,542
	2062	961	2,211	157,176	149	343	24,623
	2063	793	1,824	140,261	118	271	21,049
	2064	652	1,499	122,816	93	214	17,662
	2065	533	1,225	106,747	73	167	14,712
	2066	433	995	92,321	57	130	12,197

History	6,788,910	6,788,910	1,220,190	8,963,570	8,963,570	1,473,526
Future	4,828,083	10,068,262	26,849,788	3,417,290	6,866,632	12,042,374
Lifetime	11,616,993	16,857,172	28,069,978	12,380,860	15,830,202	13,515,900

[1] Future incurred claims are increased by 15% to reflect assumptions for moderately adverse conditions.

Prospective PV approach

This approach avoids a recoupment of past losses by considering only future projections. The following formula is used to compute an allowable rate increase for a block of LTC insurance policies:

$$\text{rate increase \%} = \frac{\Delta PV(\text{future incurred claims}) - \left(\frac{.58 + .85C}{1+C}\right)\Delta PV(\text{future earned premiums})}{.85\, PV_{\text{current}}(\text{future earned premiums})}$$

where:

Δ indicates the change in present value (PV) due to the change in actuarial assumptions between the time of the last rate increase (or the original assumptions if there was no prior rate increase) and the current assumptions

C is the cumulative percent rate increase to date. For example, if the current rate, prior to the proposed rate increase, is 50 percent higher than the rate at initial pricing, then C = .5

The *current* subscript in the denominator indicates that the PV should be computed using current assumptions. The future earned premiums in the formula are based on the current premiums prior to the proposed rate increase. Regulators may wish to consider the addition of margin to the rate increase. For example, the ΔPV(future incurred claims) term in the above formula could be multiplied by 1.1 to represent a 10 percent margin.

The formula is limited to **active, premium-paying policyholders** as of the time of the filing. All present value calculations in the formula should be based on the same set of current active lives.

For pre-rate stabilized policies, one could use .6 in place of .58 and .8 in place of .85:

$$\text{rate increase \%} = \frac{\Delta PV(\text{future incurred claims}) - \left(\frac{.6 + .8C}{1+C}\right)\Delta PV(\text{future earned premiums})}{.8\, PV_{\text{current}}(\text{future earned premiums})}$$

Justification for the formula

The numerator represents the amount of additional funding needed, on a prospective basis, as a result of the change in actuarial assumptions. This amount reflects the increase in the PV of incurred claims, and is partly offset by the increase in the PV of future net premiums, where net premiums are computed by multiplying gross premiums by the loss ratio.

To compute the loss ratio, if P_0 is the premium at initial pricing and P is the current premium prior to the proposed rate increase, then:

$$P = P_0(1 + C)$$

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so

$$P_0 = \frac{P}{1+C}$$

The portion of current premium due to prior increases is:

$$P - P_0 = P - \frac{P}{1+C} = \frac{PC}{1+C}$$

Applying a 58 percent loss ratio to the initial premium and an 85 percent loss ratio to the increase portion, the loss ratio is:

$$\frac{.58\frac{P}{1+C} + .85\frac{PC}{1+C}}{P} = \frac{.58 + .85C}{1+C}$$

Since a loss ratio of 85 percent applies to the rate increase, which provides the additional funding needed, then:

$$.85\ \Delta PV_{\text{current}}(\text{future earned premiums}) =$$
$$\Delta PV(\text{future incurred claims}) - \left(\frac{.58 + .85C}{1+C}\right)\Delta PV(\text{future earned premiums})$$

The percentage rate increase, computed as ΔPV / PV of future earned premiums, is found by dividing both sides of the above equation by $.85\ PV_{\text{current}}(\text{future earned premiums})$:

$$\text{rate increase \%} = \frac{\Delta PV(\text{future incurred claims}) - \left(\frac{.58 + .85C}{1+C}\right)\Delta PV(\text{future earned premiums})}{.85\,PV_{\text{current}}(\text{future earned premiums})}$$

Possible Modifications to Prospective PV approach

The prospective PV formula is intended to produce a rate increase that is adequate to fund the projected increase in future claim liabilities. However, a regulator should consider modifications to the formula based on the following:

- Disapproval of a prior actuarially justified rate increase.
- A prior actuarially justified rate increase reduced by the regulator.
- Approval of a prior actuarially justified rate increase after significant delay, offset by any company delay in filing for an actuarially justified rate increase.

Note that the use of any prior "actuarially justified" rate increase requires documented justification in the prior rate filing.

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Examples of the modifications that could be made to the prospective PV formula are described below:

Catch-up Provision (For rate increase requests denied or delayed)

If part of a past rate increase request has been denied, or if there was a material delay in the prior approval, for the new rate to be consistent with the underlying methodology of the Base Formula, a company must be granted an additional rate increase amount, called the catch-up provision. The catch-up provision is designed to reflect in a new rate increase the necessary additional premiums based on the assumptions provided to the department at the time of the previous rate increase request that were not approved with the prior filing(s). It will not take into account any deviation in actual experience from assumed experience during that time period.

$$\text{Catch-up rate increase \%} = \frac{.85\ AV(\text{Premiums Requested}^P) - .85\ AV(\text{Premiums Approved}^P)}{.85\ PV_{current}(\text{future earned premiums})} + \frac{.85\ PV(\text{Premiums Requested}^F) - .85\ PV(\text{Premiums Approved}^F)}{.85\ PV_{current}(\text{future earned premiums})}$$

Where;

AV is the Accumulated Value at the time of the new rate increase request using the actuarial assumptions made at the time of the previous rate increase request(s).

PV is the Present Value at the time of the new rate increase request using the actuarial assumptions made at the time of the previous rate increase request(s).

Premiums Requested^P is the total past premiums that would have been collected had the entire rate increase request been granted in a timely manner based on the actuarial assumptions made at the time of the previous rate increase request(s)

Premiums Requested^F is the total future premiums that would have been collected had the entire rate increase request been granted in a timely manner based on the actuarial assumptions made at the time of the previous rate increase request(s)

Premiums Approved^P is the total past premiums that were collected based on the rate increase approved at the time of the previous rate increase request(s)

Premiums Approved^F is the total future premiums that would have been collected based on the rate increase approved at the time of the previous rate increase request(s)

For pre-rate stabilized policies, use .8 in place of .85.

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Transition Provision (For Pre-Rate Stability products and other products where the last rate increase requests was voluntarily reduced by the company)

If the prior rate increase request was not subject to the Rate Stability actuarial certification or a past rate increase request has been voluntarily reduced from the amount per such certification, a transition period needs to be established for companies to make a single filing to provide the full amount of premium necessary to meet the actuarial certification (consistent with the Model Bulletin calculation requirements). This transition filing would establish the assumptions to be used as the "prior assumptions" for future Base Formula requests and the maximum "Prior Premium" scale for these policies based on those prior assumptions. For any new filing of a rate increase to the Prior Rate scale to be consistent with the underlying methodology of the Base Formula, a company must be granted increases from the current approved premium scale up to but not above the maximum Prior Premium scale as part of the Transition amount. In this instance, the company will not be allowed to recapture past premiums that would have been collected if the rate increase request had not been voluntarily reduced. To the extent that a company requests a Transitional increase and a state denies or reduces the amount, the amount denied would be allowed in future rate increase requests under the Catch-Up Provision.

$$\text{Transition rate increase \%} = \frac{.85\ PV(\text{Premiums Justified}) - .85\ PV(\text{Premiums Requested})}{.85\ PV_{current}(\text{future earned premiums})}$$

Where;

PV is the Present Value using the actuarial assumptions made at the time of the previous rate increase request(s).

Premiums Justified is the total future premiums that would have been collected had the previous rate increase request been based upon the entire amount calculated in the Base Formula and Catch-up Provisions at the time of the previous rate increase request(s)

Premiums Requested is the total future premiums that would have been collected based on the entire rate increase requested at the time of the previous rate increase request(s)

For pre-rate stabilized policies, use .8 in place of .85.

Calculation of Entire Rate Increase

Total Rate Increase = Base Formula Increase % + Catch-up Increase % + Transition Increase %

DRAFT

MEDAmerica
An Excellus Company

MedAmerica Insurance Company
Home Office: Pittsburgh, PA

MedAmerica Insurance Company of New York
Home Office: Rochester, NY

MedAmerica Insurance Company of Florida
Home Office: Orlando, FL

December 4, 2018

Mr. Bill Dismore
Virginia Bureau of Insurance (Bureau)

Via SERFF

RE: MedAmerica Insurance Company (MedAmerica)
Company NAIC #69515
SERFF Tracking #MILL-131333141

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Mr. Dismore:

Thank you for reviewing this filing. This letter is in response to your letter dated November 30, 2018 regarding the above-referenced filing. The Bureau's requests are restated in italics below, followed by my responses.

1. *Please provide the policyholder count for this block by age band (i.e. <40; 40-44; 45-49; 50-54; 55-59; 60-64; 65-69; 70-74; 75+)*

Table I below provides the inforce policyholder counts for the block by age band, for both MedAmerica and CICA insureds.

Table I

MedAmerica Insurance Company / Combined Insurance Company of America

Virginia Inforce December 31, 2016

	515 Series with Inflation[1]		515 Series no Inflation		Total
Age Band	**MedAmerica**	**CICA**	**MedAmerica**	**CICA**	
<40	1	2	1	0	4
40-44	2	0	1	0	3
45-49	8	0	3	0	11
50-54	10	3	3	0	16
55-59	14	4	1	1	20
60-64	33	6	31	4	74
65-69	17	3	25	0	45
70-74	2	1	11	0	14
75+	1	0	4	1	6
Total	**88**	**19**	**80**	**6**	**193**

[1] **Only policies with inflation protection are subject to the rate increase**

2. *Given the fact that the policies were first issued in April of 1999 and that the block was acquired in 2008, provide an explanation as to why a rate increase was not requested prior to this rate filing.*

   Prior to 2015, the company prioritized its rate increase filings based on the size of the applicable block in each jurisdiction and the perceived likelihood of approval, as compared to our available resources for rate increase filings.

   We submitted a rate filing for this block in July of 2015 as part of a nationwide rate increase filing, however that filing was allowed to expire. During the Bureau's review of another of the company's filings, we were made aware of a requirement to file a summary of benefits form for approval by the Bureau, and to make modifications to our policyholder notification letter to satisfy the requirements of Virginia Regulation 14VAC5-200-75.D. That form filing (SERFF # MEAM-131057979) was approved 10/19/2017, and our revised policyholder notification letter template is currently under review by the Bureau (SERFF # MILL-131285847).

Thank you for working with us to complete this filing in Virginia. Please let me know if you have any additional questions. You can reach me directly at (585) 238-4379 or by e-mail at: patrick.kinney@medamericaltc.com.

Respectfully,

J. Patrick Kinney III, FSA, MAAA
Managing Actuary, LTC Pricing
MedAmerica Insurance Company
165 Court Street, Rochester NY 14647
(585) 238-4379

8500 Normandale Lake Blvd.
Suite 1850
Minneapolis, MN 55437-3830
USA

Tel +1 952 897 5300
Fax +1 952 897 5301

milliman.com

January 16, 2019

Bill Dismore
Virginia Bureau of Insurance (Bureau)

Via SERFF

Re: MedAmerica Insurance Company (MedAmerica)
Company NAIC # 69515
SERFF Tracking # MILL-131333141
515 Series

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Mr. Dismore:

Thank you for reviewing this filing. This letter is in response to your letter dated January 9, 2019 regarding information needed for the above-referenced filing. The remainder of this letter provides the additional information requested in your January 9 letter. The requests are restated in italics for reference.

1. *Please revise the Minimum % Change to 0% since we understand that the Company is requesting 130% for benefits with inflation protection but 0% increase for those policies that do not offer inflation protection. The Overall % Indicated Change and Overall % Rate Impact will also need to be revised.*

   The rate/rule schedule in SERFF has been updated via a post submission update to reflect all policies on the above-listed form (515 Series), rather than just policies with inflation protection benefits.

2. *Please advise if the proposed rate increase were to be approved as requested and the future experience develops as expected under moderately adverse conditions, is the company able to certify that no future rate increases would be requested.*

   For policies with inflation protection on the 515 Series, a cumulative rate increase of 420% would be needed to restore the lifetime performance of this block to the original pricing expectation and certify that rates will remain stable under moderately adverse conditions as stated in Section 23 of the August 30 actuarial memorandum. The company is currently requesting a 130% cumulative increase on the 515 Series nationwide. While the company does not currently anticipate additional rate increases, it will continue to monitor the business and reserves the right to request additional rate increases in the future.

Offices in Principal Cities Worldwide

This work product was prepared solely to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

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In performing this analysis, we relied on data and other information provided by MedAmerica. We have not audited or verified this data and other information. If the underlying data or information is inaccurate or incomplete, the results of our analysis may likewise be inaccurate or incomplete. In that event, the results of our analysis may not be suitable for the intended purpose. We performed a limited review of the data used directly in our analysis for reasonableness and consistency and have not found material defects in the data. If there are material defects in the data, it is possible that they would be uncovered by a detailed, systematic review and comparison of the data to search for data values that are questionable or for relationships that are materially inconsistent. Such a review was beyond the scope of our assignment.

I, Missy Gordon, am a Principal and Consulting Actuary for Milliman, Inc. I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render an actuarial opinion as described herein.

❖❖❖

Bill, thank you for working with us to complete this filing in Virginia. Please let me know if you have any additional questions. You can reach me directly at (952) 820-2478 or by e-mail at missy.gordon@milliman.com. Alternatively, you may contact Michael Emmert, the contact of record for this filing, at (952) 820-3116 or by e-mail at michael.emmert@milliman.com.

Respectfully,

Missy Gordon

Missy Gordon, FSA, MAAA
Principal and Consulting Actuary

MAG/cmn

Post Submission Update

This work product was prepared solely to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

8500 Normandale Lake Blvd.
Suite 1850
Minneapolis, MN 55437-3830
USA

Tel +1 952 897 5300
Fax +1 952 897 5301

milliman.com

January 29, 2019

Bill Dismore
Virginia Bureau of Insurance (Bureau)

Via SERFF

Re: MedAmerica Insurance Company (MedAmerica)
Company NAIC # 69515
SERFF Tracking # MILL-131333141
515 Series

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Mr. Dismore:

Thank you for reviewing this filing. This letter is in response to your letter dated January 17, 2019 regarding information needed for a concurrent filing under SERFF tracking # MILL-131588701. The remainder of this letter provides the additional information requested in your January 17 letter. The request is restated in italics for reference.

Since the number of policyholders, the minimum % and overall % change has be altered, please ensure the Rate Request Summary and the Actuarial Memorandum has been updated to reflect these changes.

Enclosed with this letter is a cover letter, actuarial memorandum, and Rate Request Summary that have been updated to reflect the policyholder counts and requested rate increases for all policies on the above-listed form (515 Series), rather than just policies with inflation protection benefits.

Limitations and Qualifications

Milliman's work has been prepared for the use and benefit of MedAmerica. Milliman's work may not be provided to third parties without Milliman's prior written consent. Milliman does not intend to benefit any third party recipient of its work product, even if Milliman consents to the release of its work product to such third party.

Milliman's work is being delivered to the Bureau, in accordance with its statutory and regulatory requirements. Milliman recognizes that materials it delivers to the Bureau may be public records subject to disclosure to third parties, however, Milliman does not intend to benefit and assumes no duty or liability to any third parties, including the Bureau, who receive Milliman's work and may include disclaimer language on its work product so stating. To the extent that Milliman's work is not subject to disclosure under applicable public records laws, the Bureau agrees that it shall not disclose Milliman's work product to third parties without Milliman's prior written consent; provided, however, that the Bureau may distribute Milliman's work to (i) its professional service providers who are subject to a duty of confidentiality and who agree to not use Milliman's work product for any purpose other than to provide services to the Bureau, or (ii) any applicable regulatory or governmental agency, as required.

This work product was prepared solely to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

In performing this analysis, we relied on data and other information provided by MedAmerica. We have not audited or verified this data and other information. If the underlying data or information is inaccurate or incomplete, the results of our analysis may likewise be inaccurate or incomplete. In that event, the results of our analysis may not be suitable for the intended purpose. We performed a limited review of the data used directly in our analysis for reasonableness and consistency and have not found material defects in the data. If there are material defects in the data, it is possible that they would be uncovered by a detailed, systematic review and comparison of the data to search for data values that are questionable or for relationships that are materially inconsistent. Such a review was beyond the scope of our assignment.

Differences between our projections and actual amounts depend on the extent to which future experience conforms to the assumptions made for this analysis. It is certain that actual experience will not conform exactly to the assumptions used in this analysis. Actual amounts will differ from projected amounts to the extent that actual experience deviates from expected experience.

I, Missy Gordon, am a Principal and Consulting Actuary for Milliman, Inc. I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render an actuarial opinion as described herein.

❖❖❖

Bill, thank you for working with us to complete this filing in Virginia. Please let me know if you have any additional questions. You can reach me directly at (952) 820-2478 or by e-mail at missy.gordon@milliman.com. Alternatively, you may contact Michael Emmert, the contact of record for this filing, at (952) 820-3116 or by e-mail at michael.emmert@milliman.com.

Respectfully,

Missy Gordon

Missy Gordon, FSA, MAAA
Principal and Consulting Actuary

MAG/ddm

Enclosures
Updated Cover Letter
Updated Actuarial Memorandum
Health Insurance Rate Request Summary

This work product was prepared solely to provide assistance to MedAmerica. Milliman does not intend to benefit and assumes no duty or liability to other parties who receive this work. Milliman recommends recipient be aided by its own actuary or other qualified professional when reviewing the Milliman work product.

MEDAmerica
An Excellus Company

MedAmerica Insurance Company
Home Office: Pittsburgh, PA

MedAmerica Insurance Company of New York
Home Office: Rochester, NY

MedAmerica Insurance Company of Florida
Home Office: Orlando, FL

October 25, 2019

Mr. Bill Dismore
Virginia Bureau of Insurance (Bureau)

Via SERFF

RE: MedAmerica Insurance Company (MedAmerica)
Company NAIC #69515
SERFF Tracking #MILL-131333141

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Mr. Dismore:

Thank you for reviewing this filing. This letter is in response to your letter dated October 2, 2019 regarding the above-referenced filing. The Bureau's requests are restated in italics below, followed by my responses.

This letter is submitted concurrently with a similar response on the CICA filing (SERFF# MILL-131588701). MedAmerica had assumed these policies from CICA.

Objection 1

a. *Explain the reason for the large increase given that most of the premium has been earned on this block.*

As described in the Actuarial Memorandum, the Company is requesting a rate increase to help alleviate the poor performance on this block of business. The requested increase was determined such that the business would break even with margin in the future. An even larger rate increase could be supported based on loss ratio and rate stability regulation.

b. *Explain why such a large increase considering the fact there has been no increase since the acquisition of this block of business in 2008.*

We submitted a rate filing for this block in July of 2015, as explained in our December 4, 2018 response letter, and in the response to item 1.e. below. The Company has sought and achieved significant rate increases in other jurisdictions nationwide (see our September 7, 2018 response.) We have been working with the Bureau for quite some time in efforts to achieve approval of a rate increase.

c. *In accordance with 14VAC5-200-125 A. 1. (2). (b). explain why a plan of action was not submitted to the Virginia Bureau of Insurance, including a timeframe for the reestablishment of adequate margins for moderately adverse experience. We note that the Company reported that the premium rates were insufficient in both the 2016 and 2017 Long Term Care Annual Reports for both pre and post stability policies (SERFF #s MEAM-131082302 (2017); MEAM-130704921 (2016); MEAM-131082301 (2017); MEAM- 130704926 (2016).*

The Company's plan of action has been contained in our Annual Reports each year (excerpts below). Our plan has always been to seek approval of a premium rate increase. The Bureau expects the Company to identify a timeframe for the reestablishment of adequate margins for moderately adverse experience, yet any timeframe is wholly dependent on the Bureau's approval of the Company's rate and form filings.

> 2016: "Our external actuarial consultants are in the process of completing a nationwide rate increase filing for these policy forms. … we expect to resubmit an appropriate rate increase filing in Virginia later this year."
>
> 2017: "We plan to resubmit a rate increase filing once MedAmerica receives approval of its pending form filing that may allow the rate increase to be reviewed." *(form filing approval received 10/19/17)*
>
> 2018: "… [this] rate increase filing is pending with the Bureau of Insurance (SERFF Tracking Number MILL-131333141)."
>
> 2019: "A rate increase filing is pending with the Bureau of Insurance (SERFF Tracking Number MILL-131333141)."

d. *Explain the drivers of the current rate increase request for 130% that differs from those considered in the past filing (MILL-129349264) in which the increase requested was 38%. Explain the time value of money impact that the rate increase delay had on the current rate request.*

The drivers of the current request are the same as those in the past filing and are attributable to lapse and mortality.

The prior requested rate increase of 38% was determined by targeting the rate increase needed from inception to restore the performance of this block of business to the original pricing expectation. This approach is one of the most restrictive as it assumes the company could have had perfect knowledge at issue. A discussion regarding this restrictive approach was provided in item 4 of the November 12, 2018 response letter.

As the company could no longer bear the burden of this restrictive approach, the current cumulative rate increase for policies with inflation protection was determined such that the business would break even (i.e., 0% profit margin) with margin going forward. The company believes that even with this change to its approach, it is still sharing in the cost of the rate increase because this approach results in the company bearing the burden of the historical losses. As mentioned in Section 18 of the actuarial memorandum, a rate increase of 420% is needed on average nationwide to restore the lifetime performance of the 515 Series policies with inflation protection to the original pricing expectation. The requested increase is 130%. The portion of the rate increase needed to restore the 515 Series to its original pricing expectation that the consumer is bearing equals 31% (= 130% / 420%).

Additionally, the company has tried to minimize the requested rate increase to the extent possible. However, it is unable to continue accepting the level of adverse performance from that expected in pricing on policies with inflation protection and decided to pursue an increase by inflation protection. MedAmerica has 100% of the risk on this business and is a monoline long-term care company.

Since 2015, MedAmerica has strengthened its disabled life reserve by approximately $38 million and holds an asset adequacy reserve of $135 million.

Attachments 1 and 2 demonstrate that the time value of money did not impact the requested rate increase. Attachment 1 to this letter provides similar information to Attachment C-3 of the August 30, 2018 response letter, except assumes the requested increase of 130% on policies with inflation protection was implemented on January 1, 2016. Attachment 2 to this letter provides similar information to Attachment 10-c of the November 12, 2018 response letter, except assumes the requested increase of 130% on policies with inflation protection was implemented on January 1, 2016. As demonstrated in Attachments 1 and 2, the current requested rate increase still passes the loss ratio tests required by 14VAC5-200-150 and 14VAC5-200-153 when the increase is assumed to be implemented in 2016.

Additionally, an average 278% nationwide rate increase would have been needed on January 1, 2016 in order to restore the 515 Series policies with inflation protection to the original pricing expectation. As the current request of 130% is well below the 278% that was needed, this further demonstrates that the company is sharing in the cost of the rate increase and that the time value of money did not impact the request.

e. *Provide an explanation for the Company's non-response to objections filed under SERFF MILL-129349264 submitted in 7/2015.*

I apologize for the lack of response to the prior rate filing objections. We submitted that filing for this block in July of 2015 as part of a nationwide rate increase filing, however the filing in Virginia was allowed to expire, with the intent of resubmitting a rate filing once we were able to bring the Company's forms filings into compliance. As discussed in item c. above, the current rate filing under consideration was submitted in 2018 after the Bureau's approval in late 2017 of the necessary form filing.

As explained in our December 4, 2018 response, during the Bureau's review of another of the Company's 2015 filings, we were made aware of a requirement to file a summary of benefits form for approval by the Bureau, and to make modifications to our policyholder notification letter to satisfy the requirements of Virginia Regulation 14VAC5-200-75.D. The summary of benefits form filing (SERFF # MEAM-131057979) was approved 10/19/2017, and our revised policyholder notification letter template is currently under review by the Bureau (SERFF # MILL-131285847). It is our understanding that the approval of the policyholder notification letter template submitted under one rate filing would allow the letter to be used for all products, with appropriate differences in variable language.

Objection 2

The Company states in the actuarial memorandum and in the policyholder notification letter that a policyholder may offset the increased premium by reducing the level of benefits.

a. *Please describe in detail the reduction in benefit options.*

Attachment 3 to this letter provides illustrative examples, for sample benefits and issue ages, which demonstrate how a policyholder could offset some, or all, of the requested rate increase by electing one or more of the reduced benefit options. The examples provided in Attachment 3 are consistent with the benefit reduction movements within the rate schedules.

Included in Attachment 3 are examples showing the impact on premiums at various issue ages when a policyholder (i) shortens their benefit period, (ii) reduces their daily benefit from $100 to $80,

(iii) increases their elimination period, (iv) drops their 5% compound inflation option and keeps their current inflated daily benefit, (v) drops their 5% compound inflation option and resets their daily benefit to $100, and (vi) reduces their benefit period and decreases their monthly benefit from $100 to $80. Columns (a) and (b) of Attachment 3 use the current rates, and column (d) uses the proposed base rates. The impact of reducing just one benefit option may not fully offset the proposed rate increase as illustrated in Attachment 3. Additional benefit reduction options are available to policyholders beyond those shown in Attachment 3, which is for illustrative purposes only.

The company is also offering a contingent benefit upon lapse (CBUL) to insureds that trigger a substantial rate increase. Additionally, the company will voluntarily offer a CBUL to insureds affected by the rate increase, even if the increase is not considered substantial.

b. Are these considered landing spots?

No, any benefit reduction offered will be a benefit option already provided within the filed rate structure.

c. Out of concern for policyholder equity, please provide several examples of the variability in the relative present value of each reduction in benefit option available in lieu of an increase from the individual policyholder perspective.

Benefit reductions are not determined based on a present value calculation. Benefit reductions are based on movements within the filed rate schedules. It is assumed that each rate in the current rate schedule represents a "value" for its corresponding benefit that is actuarially equivalent to the "value" of other rates in the current schedule. Policyholders can reduce their benefits at any time, and this approach is consistent with the benefit reductions available at any other time. Furthermore, when a policyholder reduces benefits, this approach ensures that any two policyholders with the same benefits (i.e., they are in the same rating cell) will pay the same rates.

As shown in Attachments 1 through 8 of the November 12, 2018 response letter, experience with inflation protection is expected to be worse than policies without inflation protection. The rate increase varies by inflation protection to address the adverse experience by inflation protection. The "value" for the rates is being adjusted to a more actuarially equivalent rate level, but the lifetime loss ratio after the rate increase for policies with inflation protection is still greater than the lifetime loss ratio for policies without inflation protection.

Item 2.a. above provides a discussion on the options available to policyholders to reduce benefits.

Objection 3

Please justify the 130% increase for post-stability plans with inflation protection given that the results of Loss Ratio Testing required by 14VAC5-200-150 and 153 indicate that the pre-stability policies pass the test with the rate increase and adjustment for active life reserves (65%) but post-stability policies fail the test both with no Increase in future projections adjusted for active life reserves (48%) and with the proposed increase adjusted for active life reserves (27%).

The company understands that the Bureau is using the following formula in the calculation of the referenced loss ratios that includes the active life reserve (ALR).

$$\text{Loss Ratio with ALR} = \frac{\text{Future Incurred Claims} - \text{ALR}}{\text{Future Earned Premium}}$$

Where ALR is as of December 31, 2016, and the future incurred claims and earned premium are the present values of incurred claims and earned premium as of December 31, 2016 using the maximum valuation interest rate.

The company would note that this test is not specified in 14VAC5-200-150 or 14VAC5-200-153. The loss ratio tests specified in the pre- and post-rate stability regulations are the dual loss ratio test and the 58%/85% test, respectively. The dual loss ratio test for policies issued under pre-rate stability regulation is provided in Attachment C of the August 30, 2018 response letter. The 58%/85% test for policies issued under post-rate stability regulation is provided in Attachment 10 of the November 12, 2018 response letter. The requested rate increase passes the tests specified in 14VAC5-200-150 or 14VAC5-200-153. Therefore, the requested rate increase on the post-rate stability policies is justified.

The company would also note that the ALR used in this formula is significantly higher than the ALR balance anticipated at the time of pricing due to higher persistency. As mentioned above, MedAmerica has had to establish a significant asset adequacy reserve. The establishment of the additional ALR as well as the asset adequacy reserve have been a strain on capital that is not being reflected in the above formula.

While the requested rate increase complies with Virginia's required loss ratio tests, if it is the Bureau's position that the post-rate stability policies must comply with the above formula, then the company would be willing to forgo the requested rate increase on the post-rate stability policies at this time in order to expedite the resolution of this filing given that it has been pending since May 2018 and there is relatively small amount of business that is post-rate stability. However, as the company believes that the originally requested rate increase is reasonable, needed, and justified under Virginia regulation, it would still plan to pursue additional rate increase requests in Virginia until the cumulative rate increase approved is actuarially equivalent to the original request.

In order to expedite the filing, the company is willing to comply with the Bureau's position and forgo the requested rate increase on post-rate stability policies. The following table provides a revised rate increase that varies by the issue date of the policy to comply with the Bureau's above formula.

Virginia-Specific Rate Increase Request
For 515 Series Policies with Inflation Protection

Issue Date	Revised Requested Increase
Prior to October 1, 2003	130%
On or After October 1, 2003	0
Average	105

Enclosed with this response are revised current and proposed rate tables to separate the rates based on the issue date of the policy. Please note that the actual rates implemented may vary slightly from those in the enclosed rate tables due to implementation rounding algorithms.

Through a SERFF post-submission update, we have revised the Rate/Rule Schedule tab to reflect the revised increase. We respectfully request that the Bureau acknowledge the post-submission update prior to issuing the disposition in order for the disposition to capture this change.

Objection 4

Please explain the differential in the cumulative rate increase in Virginia compared to the nationwide cumulative increase to assure the BOI that rate subsidization is not occurring. The current cumulative rate increase request of 130% exceeds the current round of approved cumulative increases, 49%, amongst states where the company has reached a resolution.

MedAmerica determines and files its rate increase requests on a consistent basis nationwide, unless limited by state regulation. Our goal is equity across jurisdictions. For the CICA filing, a cumulative increase of 130% on policies with inflation protection was requested, as in Virginia. The differential between this level and the current round of approved increases is due to (a) differences in prior rate increases across jurisdictions and (b) differences among jurisdictions in the level of cumulative increase they have approved. The Company plans to request additional rate increases in jurisdictions that have not approved our full request, until the cumulative rate increase approved is actuarially equivalent to our full request.

Objection 5

1. *What is the Company's plan regarding future rate increases if the requested increase is not approved in full?*

As stated in item 4 above, the Company plans to request additional rate increases until the cumulative rate increase approved is actuarially equivalent to our full request.

2. *If the full rate increase is approved, is the Company willing to certify that no future rate increases will take place?*

The Company will monitor experience and reserves the right to request additional rate increases if justified by emerging experience. As stated in Section 23 of the Actuarial Memorandum, a significantly higher rate increase would be required in order to certify under "moderately adverse conditions" that no further rate increases are anticipated.

Based on a previous discussion with the Bureau, I understand that "certification" (in the context of this objection) would require a statement that the company will not increase premiums in the future, as described in the "Instructions for Annual Rate Reports Required by 14 VAC 5-200-125." Given the significant uncertainties involved in long-term care insurance coverage, MedAmerica management cannot commit itself to what would become noncancelable premium rates on a guaranteed renewable product.

Thank you for working with us to complete this filing in Virginia. Please let me know if you have any additional questions. You can reach me directly at (585) 238-4379 or by e-mail at: patrick.kinney@medamericaltc.com.

Respectfully,

J. Patrick Kinney III, FSA, MAAA
Managing Actuary, LTC Pricing
MedAmerica Insurance Company
165 Court Street, Rochester NY 14647
(585) 238-4379

Attachment 1: Dual Loss Ratio Test Assuming a 2016 Implementation Date
Attachment 2: 58%/85% Test Assuming a 2016 Implementation Date
Attachment 3: Reduced Benefit Options Illustrative Example

Enclosures: Revised Current and Proposed Rate Tables

Attachment 1
Demonstration that the Requested Cumulative Rate Increase Passes the Dual Loss Ratio Requirement when Implemented in 2016
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with Inflation Protection Issued Prior to October 1, 2003

1	Accumulated value of initial earned premium	94,072,730	x	71%	=	67,043,320
2a	Accumulated value of earned premium	96,918,843				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	2,846,112	x	85%	=	2,419,196
3	Present value of future projected initial earned premium	16,117,631	x	71%	=	11,486,639
4a	Present value of future projected premium	37,070,550				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	20,952,920	x	85%	=	17,809,982
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**98,759,136**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					28,663,703
6b	Present value of future projected incurred claims without the inclusion of active life reserves					76,252,801
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**104,916,505**
8	Test: 7 is not less than 5					Pass

All premium and incurred claims are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which is 4.5%.
Initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
Initial earned premium reflects the actual rate level in Virginia as of December 31, 2016.

Attachment 2
Demonstration that the Requested Cumulative Rate Increase Passes the 60%/85% Loss Ratio Minimum when Implemented in 2016
MedAmerica, CICA, and CLICNY Nationwide Experience Restated to Reflect No Prior Rate Increase
515 Series with Inflation Protection Issued On or After October 1, 2003

1	Accumulated value of initial earned premium	8,883,523	x	60%	=	5,315,701
2a	Accumulated value of earned premium	9,342,616				
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	459,093	x	85%	=	390,229
3	Present value of future projected initial earned premium	3,276,130	x	60%	=	1,960,363
4a	Present value of future projected premium	7,535,099				
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	4,258,969	x	85%	=	3,620,124
5	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1, 2b, 3, and 4b**					**11,286,416**
6a	Accumulated value of incurred claims without the inclusion of active life reserves					1,461,284
6b	Present value of future projected incurred claims without the inclusion of active life reserves					11,742,298
7	**Lifetime Incurred Claims with Rate Increase: Sum 6a and 6b**					**13,203,582**
8	Test: 7 is not less than 5					Pass

All values are accumulated or discounted at the maximum valuation interest rate for contract reserves applicable for the year of issue, which ranges from 4.0% to 4.5%.
Initial earned premium schedule (i.e., without the requested rate increase) reflects the assumed impact of CBUL and RBO.
The future projected incurred claims (item 6b) were increased by 15% to reflect assumptions with moderately adverse experience.

Attachment 3
MedAmerica Insurance Company
Reduced Benefit Option Illustrative Examples
515 Series Policy Form

Benefit Plan Design:
$100 Monthly Benefit Amount
Lifetime Benefit Period
90-Day Elimination Period
5% Compound Inflation Protection
Long Term Care Policy Form 14515-VA
Standard Premium Rates for Individual Tax-Qualified Policy Form

Premium Impact of Shortening Benefit Period (BP)					
Issue Age	(a) Premium with Lifetime BP	(b) Premium with 1600 Day BP	(c) Requested Rate Increase	(d) = (b) x [1 + (c)] Premium After Increase and Reduced BP	(e) = (d) / (a) -1 Effective Rate Increase
50	834	582	130%	1,339	60%
60	1,529	1,092	130%	2,512	64%
70	2,968	2,198	130%	5,054	70%

Premium Impact of Reducing Daily Benefit (DB)[1]					
Issue Age	(a) Premium with $100 DB	(b) Premium with $80 DB	(c) Cumulative Requested Rate Increase	(d) = (b) x [1 + (c)] Premium After Increase and Reduced MB	(e) = (d) / (a) -1 Effective Rate Increase
50	834	667	130%	1,535	84%
60	1,529	1,223	130%	2,813	84%
70	2,968	2,375	130%	5,462	84%

[1] After 16 durations, the current inflated DB is $208 or $166 for an initial DB of $100 or $80, respectively.

Premium Impact of Increasing Elimination Period (EP)					
Issue Age	(a) Premium with 90-Day EP	(b) Premium with 180-Day EP	(c) Cumulative Requested Rate Increase	(d) = (b) x [1 + (c)] Premium After Increase and Increased EP	(e) = (d) / (a) -1 Effective Rate Increase
50	834	776	130%	1,785	114%
60	1,529	1,383	130%	3,181	108%
70	2,968	2,690	130%	6,186	108%

Premium Impact of Reducing Inflation Protection (IP) and Keeping Current Inflated DB[1]					
Issue Age	(a) Premium with Compound IP	(b) Premium without IP	(c) Cumulative Requested Rate Increase	(d) = (b) x [1 + (c)] Premium After Increase and Reduced IP	(e) = (d) / (a) -1 Effective Rate Increase
50	834	894	0%	894	7%
60	1,529	1,746	0%	1,746	14%
70	2,968	3,763	0%	3,763	27%

[1] After 16 durations, the current inflated DB is $208 and for an initial DB of $100.

Premium Impact of Reducing IP and Resetting DB[1]					
Issue Age	(a) Premium with Compound IP	(b) Premium without IP	(c) Cumulative Requested Rate Increase	(d) = (b) x [1 + (c)] Premium After Increase and Reduced IP	(e) = (d) / (a) -1 Effective Rate Increase
50	834	430	0%	430	-48%
60	1,529	840	0%	840	-45%
70	2,968	1,810	0%	1,810	-39%

[1] After 16 durations, the current inflated DB is $208 and resetting the DB restores the DB to the initial level of $100.

Premium Impact of Shortening BP and Reducing DB					
Issue Age	(a) Premium with Lifetime BP and $100 DB	(b) Premium with 1600 Day BP and $80 DB	(c) Cumulative Requested Rate Increase	(d) = (b) x [1 + (c)] Premium After Increase and Reduced BP and DB	(e) = (d) / (a) -1 Effective Rate Increase
50	834	466	130%	1,071	28%
60	1,529	874	130%	2,009	31%
70	2,968	1,758	130%	4,044	36%

[1] After 16 durations, the current inflated DB is $208 or $166 for an initial DB of $100 or $80, respectively.

MEDAmerica

MedAmerica Insurance Company
Home Office: Pittsburgh, PA

MedAmerica Insurance Company of New York
Home Office: Rochester, NY

MedAmerica Insurance Company of Florida
Home Office: Orlando, FL

December 10, 2019

Mr. Bill Dismore
Virginia Bureau of Insurance (Bureau)

Via SERFF

RE: MedAmerica Insurance Company (MedAmerica)
Company NAIC #69515
SERFF Tracking #MILL-131333141

Tax-Qualified Long-Term Care Policy Form	**14515-VA**
Home Health Care Rider	**14531**
Inflation Protection Rider	**14532**
Non-Forfeiture Rider	**14533**

Dear Mr. Dismore:

Thank you for reviewing this filing. This letter is in response to your letter dated November 19, 2019 regarding the above-referenced filing. The Bureau's requests are restated in italics below, followed by my responses.

Objection 1

1. *Please provide a copy of the approved policy form 14515-VA.*

A copy of the approved policy form 14515-VA has been added to the Supporting Documentation.

2. *Please explain why the Statement of Variability was provided under the Supporting Documentation tab for CMCRIL-VA-0318 CMCNF-0318. It is believed that the forms have been withdrawn and are filed under MILL-131285847.*

My understanding was that template versions of MedAmerica's policyholder notification and CNF election forms were to be filed under MILL-131285847. Because these notifications are intended to be used for several different long-term care insurance policy forms, including policies originally issued by MedAmerica or Combined Insurance Company of America, the Statement of Variability appropriate to the language in each policy form is included in the policy-specific rate filings for information and future reference. All Statements of Variability are filed for approval under MILL-131285847.

3. *Please provide a "John Doe" version of the policyholder notification package under the Supporting Documentation tab that will used to notify policyholders of the rate increase.*

Per our December 6 phone conversation, the company will provide the final "John Doe" version once the Bureau is satisfied with our Notice letter. Please let me know as soon as possible so that we may complete this filing.

Objection 2
- Long Term Care Insurance Rate Request Summary (Supporting Document)
The Average Requested Percentage Rate Change Per Member is listed as 82%. Under the Rate/Rule Schedule, Company Rate Information, the Overall % Rate Impact is reported as 68%. Please explain why they are different.

The referenced filing materials have been updated to provide consistent information.

Bill, thank you for working with us to complete this filing in Virginia. Please let me know if you have any additional questions. You can reach me directly at (585) 238-4379 or by e-mail at: patrick.kinney@medamericaltc.com.

Respectfully,

J. Patrick Kinney III, FSA, MAAA
Managing Actuary, LTC Pricing
MedAmerica Insurance Company
165 Court Street, Rochester NY 14647
(585) 238-4379

APPROVED
Commonwealth of Virginia
State Corporation Commission
Bureau of Insurance
DATE 10/23/98
BY mar

Home Office
5050 Broadway, Chicago, Illinois 60640
1-800-999-2170

THIS POLICY IS A QUALIFIED LONG TERM CARE INSURANCE CONTRACT UNDER THE FEDERAL TAX CODE.

This long term care policy is intended to qualify for favorable federal tax treatment. As such, it must meet certain federal standards in addition to all applicable standards in the state in which the policy was issued or issued for delivery. If You have any questions regarding the tax qualification of this product, You should direct such questions to the appropriate federal agency, or You should contact Your tax advisor.

This Policy is issued in consideration of the statements contained in the application and payment of the first premium. Combined agrees to pay benefits to You, the Insured named in the Schedule, subject to the terms and limitations of this Policy. We suggest You carefully read it.

Check Your Application

Caution - This Policy may not apply when you have a claim! Please read! The issuance of this Long-Term Care Insurance Policy is based upon your responses to the questions on Your application. A copy of Your application is attached. If Your answers are incorrect or untrue, We have the right to deny benefits or rescind Your policy. The best time to clear up any questions is now, before a claim arises! If, for any reason, any of Your answers are incorrect, contact us at, 5050 North Broadway, Chicago, Illinois 60640.

Notice of Thirty Day Right to Examine Policy

If this Policy is not satisfactory for any reason, it can be mailed to Combined's Home Office or returned to the agent within thirty (30) days of the date it is delivered. Any premiums paid will be refunded.

Guaranteed Renewable for Life
Premiums Subject to Change

Combined guarantees that it will renew this Policy for Your lifetime. It will continue in force as long as the premium then in effect is paid on or before the due date or within the grace period.

Combined reserves the right to change the premium. Any change in premium must be made on all policies issued to persons of the same class in the state where this Policy was issued. Combined will notify You in writing of any premium change at least 31 days before the effective date of the change.

Notice to Buyer

This Policy may not cover all of the costs associated with long term care which may be incurred by a buyer during the period of coverage. The buyer is advised to periodically review this Policy in relation to the changes in the cost of long term care and carefully review all policy limitations.

Signed for Combined Insurance Company of America at Chicago, Illinois by

Richard M. Kaw
Chairman and
Chief Executive Officer

Corporate Secretary

TAX QUALIFIED LONG TERM CARE INSURANCE POLICY

GUIDE TO YOUR POLICY

This Policy is a legal contract between the Insured and Combined.
Read Your Policy Carefully.

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Schedule 3

SCHEDULE

Insured:

Address:

Policy Number:

Insured's Age on Date of Issue:

Policy Effective Date:

[Schedule Effective Date - for COLA increase]:

[Initial] Premium Amount: $ Premium Mode: [Monthly, Quarterly, Semi-Annual, Annual]

[Base Policy _____
Home Health Care Increase Rider _____
Inflation Protection Rider _____
Non-forfeiture Benefit Rider] _____
Total Premium $_____

[Premium reflects a (_____%) spouse discount]

BENEFITS

BASIC (14515) [Lifetime Multiplier]

Maximum Policy Benefit:	$_____
Elimination Period:	_____ days
Maximum Daily Benefit Amount:	
Nursing Home Confinement	$_____
Assisted Living Facility Confinement	$_____
Home Health Care - Medical Services	$_____
Home Health Care-Personal Care or Adult Day Care Services	$_____
Bed Reservation Benefit	**Up to** $_____ per day, for up to ___ days
Caregiver Training Benefit	**Up to** $_____ - lifetime maximum
Hospice Care	**Up to** $_____ per day, to a six month lifetime maximum
Respite Care	**Up to** $_____ per day - ____days per year maximum
Emergency Response System	**Up to** $____ per month, when receiving home health care - [12] month lifetime maximum

[OPTIONAL
[Home Health Care Increase] (14531)
[Inflation Protection] (14532)
[Non-forfeiture Benefit] (14533)]

Definitions

"Activities of Daily Living" (ADL's) means:

1. Bathing means washing Yourself (1) by sponge bath, or (2) in either a tub or shower including the task of getting into or out of the tub or shower.
2. Continence means the ability to maintain control of bowel and bladder function or, when unable to maintain control of bowel or bladder function, the ability to perform associated personal hygiene (including caring for catheter or colostomy bag).
3. Dressing means putting on and taking off all items of clothing and any necessary braces, fasteners or artificial limbs.
4. Eating means feeding Yourself by getting food into Your body from a receptacle (such as a plate, cup or table) or by feeding tube or intravenously.
5. Toileting means getting to and from the toilet, getting on and off the toilet, and performing associated personal hygiene.
6. Transferring means moving into or out of a bed, chair or wheelchair.

"Adult Day Care" is a planned program of care, for six (6) or more individuals of social and health related services provided during the day in a community group setting for the purpose of supporting frail, impaired elderly or other disabled adults who can benefit from care in a group setting outside the home. Care must be provided by a facility which is licensed or certified by the state as an Adult Day Care Center for impaired adults. It does not mean 24 hour care.

"Assisted Living Facility" means a place which:

1. Is licensed or certified as an Assisted Living Facility in the state where it is located; and
2. Provides twenty-four (24) hour per day personal care and custodial services to those who suffer from Cognitive Impairment or need assistance with Activities of Daily Living; and
3. Has a trained and awake staff on duty at all times to provide appropriate care, to at least ten (10) inpatients; and
4. Provides three (3) meals a day and accommodates special dietary needs; and
5. Has formal arrangements for the services of a Licensed Health Care Practitioner or nurse to furnish emergency medical care; and
6. Has appropriate methods and procedures for handling and administering drugs and biologicals.

It is **NOT**:

1. A place that is primarily used for rest; or
2. A place or any part of a place, operated mainly for the care and treatment of:
   (a) Mental and Nervous Disorders; or
   (b) alcoholism; or
   (c) drug addiction; or
3. A residential facility, congregate living facility, or a facility with similar living arrangements.

"Assisted Living Facility Care" means a program of care received as an overnight, resident patient in an Assisted Living Facility on a day for which a room and board charge is made. It does not include charges for personal convenience items such as toiletries, television or hairdressing services.

"Calendar Year" means the period of time from January 1st through December 31st.

"Caregiver Training" means training provided by a Home Health Care Agency, Nursing Home or hospital and received by the Informal Caregiver to care for You at Home.

"Chronically Ill" means You are certified by a Licensed Health Care Practitioner as:

1. Being unable to perform (without substantial assistance from another individual) at least two (2) Activities of Daily Living for a period of at least ninety (90) days due to a loss of functional capacity; or
2. Requiring substantial supervision to protect Yourself from threats to health and safety due to severe Cognitive Impairment.

You will not be considered Chronically Ill for any period unless within the twelve (12) months prior to such period a Licensed Health Care Practitioner has certified that You meet the above requirements.

"Cognitive Impairment" means a deficiency in Your short or long term memory, orientation as to person, place and time, deductive or abstract reasoning, or judgment as it relates to safety awareness.

"Emergency Response System" means a device located in Your Home, other than a telephone or other general communication device, that is designed specifically to electronically notify a provider of emergency medical services that You are experiencing an emergency due to a medical condition. The emergency medical service provider must be a licensed provider of such services.

"Elimination Period" means the number of days during which You receive care or service for which no benefit is payable. It starts on the first day You receive care or service through Your Plan of Care for which benefits are otherwise payable under this Policy. The Elimination Period is shown on the Schedule. Days of care or service need not be continuous but must be accumulated within a continuous period of 730 days.

The Elimination Period has to be satisfied only once while Your Policy is in effect.

"Functional Incapacity" means:

1. You are unable to perform (without substantial assistance from another individual) two (2) or more Activities of Daily Living; or
2. You suffer from Cognitive Impairment.

"Home" means Your home; a private home; a home for the retired or aged; a place which provides residential care; or a section of a Nursing Home providing only residential care. It does not mean a hospital.

"Home Health Aide" means a health worker on the staff of a Home Health Care Agency, other than a Licensed Health Care Practitioner, nurse or professional therapist, who performs Personal Care Services and Professional Homemaker Services incidental to Personal Care Services.

"Home Health Care Agency" means an entity which provides Home health care or Hospice Care and:

1. Is approved as a provider of Home health care or Hospice Care under Medicare; or
2. Is licensed or certified as a Home Health Care Agency or hospice in the state where it is located; or
3. Is accredited as a Home Health Care Agency or as a provider of Home health care or Hospice Care by the: (a) National League of Nursing; or (b) American Public Health Association; or (c) Joint Commission on Accreditation of Hospitals.

For purposes of this Policy, a licensed therapist, a registered nurse, a licensed practical nurse, or a licensed vocational nurse operating within the scope of his or her license will be considered as a Home Health Care Agency.

"Hospice Care" means services and supplies given by an agency meeting the regulatory requirements for a hospice in the state where services are provided. If the state has no such requirements, the agency must: (a) be primarily engaged in providing pain relief, symptom management and support service to dying persons and their families; and (b) provide nursing care under the supervision of a registered nurse.

You must: (a) have no reasonable prospect of cure; (b) have a life expectancy of less than 6 months; (c) require hospice services for palliation or management of a Terminal Condition; and (d) would otherwise require hospital or Nursing Home confinement if Hospice Care was not available.

"Immediate Family" means Your spouse and anyone who is related to You or Your spouse (including adopted, in-law, and step-relatives), mother, father, grandmother, grandfather, child, grandchild, sister, brother, aunt or uncle by blood or marriage, first cousin, nephew or niece.

"Informal Caregiver" means a person who has the primary responsibility for caring for You at Your Home. A person who is paid for caring for You cannot be an Informal Caregiver.

"Injury" means bodily harm resulting directly from an accident, independent of all other causes. The Injury must occur while Your insurance coverage is in force.

"Licensed Health Care Practitioner" means any physician, as defined in section 1861(r)(1) of the Social Security Act, and any registered professional nurse, licensed social worker, or other individual who meets such requirements as may be prescribed by the Secretary of the U.S. Treasury.

"Maintenance or Personal Care Services" means any care the primary purpose of which is the provision of needed assistance with any of the disabilities as a result of which the individual is a Chronically Ill individual, including the protection from threats to health and safety due to severe Cognitive Impairment.

"Maximum Policy Benefit" means the total dollar amount available for benefits under this Policy. The Maximum Policy Benefit is shown on the Schedule.

"Medicaid" means the program administered in accordance with Title 32.1 of the Code of Virginia.

"Medical Services" are those services that can be provided only by trained medical personnel including but not limited to such services as taking vital signs, pain management care and chemotherapy. These services must be provided by a Home Health Care Agency.

Medical Services does not include care or services rendered by a member of Your Immediate Family.

"Medicare" means the Health Insurance for the Aged Act, Title XVIII of the Social Security Amendments of 1965 as then Constituted or Later Amended.

"Mental and Nervous Disorders" means neurosis, psychoneurosis, psychopathy, psychosis, or mental or emotional disease or disorder.

"Nursing Home" means a facility or distinctly separate part of a hospital or other institution which:

1. Is licensed by the appropriate licensing agency to engage primarily in providing nursing care and related services for inpatients; and
2. Provides twenty-four (24) hour per day nursing service under a planned program of policies and procedures which was developed with the advice of and is periodically reviewed and executed by a professional group of at least one (1) Licensed Health Care Practitioner (other than the owner of the facility) and one (1) nurse; and
3. Has a Licensed Health Care Practitioner available to furnish medical care in case of emergency; and
4. Has at least one (1) nurse who is employed there full time; and

5. Has a nurse on duty or on call at all times; and
6. Maintains clinical records for all patients; and
7. Has appropriate methods and procedures for handling and administering drugs and biologicals.

It is **NOT**:

1. A place that is primarily used for rest; or
2. A place or any part of a place, operated mainly for the care and treatment of:
   (a) Mental and Nervous Disorders; or
   (b) alcoholism; or
   (c) drug addiction; or
3. A residential facility, congregate living facility, or a facility with similar living arrangements.

"Nursing Home Care" means a program of care received as an overnight, resident patient in a Nursing Home on a day for which a room and board charge is made. It does not include charges for personal convenience items such as toiletries, television or hairdressing services.

"Personal Care Services" mean hands on services to assist You with the Activities of Daily Living (ADL's) that created the Functional Incapacity or Cognitive Impairment for which You are considered Chronically Ill. Hands on services means physical assistance (minimal, moderate or maximal) without which the individual would not be able to perform the ADL. These services must be provided by a Home Health Care Agency.

"Plan of Care" means a written plan prepared by a Quality Care Coordinator at Our Expense. The Plan of Care will:

1. Identify the ADL's You are unable to perform or state that Your care is required because You suffer from Cognitive Impairment; and
2. Indicate that You are Chronically Ill; and
3. Specify the type and duration of treatment, care or services You may need; and
4. Recommend provider(s) of such care; and
5. Be consistent with generally accepted medical practice; and
6. Be appropriate to treat Your condition; and
7. Be sent to Us at: Combined Insurance Company of America, 5050 North Broadway, Chicago, Illinois 60640.

You have the right to select the Quality Care Coordinator. When You receive care and services exclusively in accordance with a Plan of Care developed by Our Quality Care Coordinator, We will pay 100% of the Policy benefits. When You receive care and services not in accordance with a Plan of Care developed by Our Quality Care Coordinator, We will pay 80% of the Policy benefits. The Plan of Care will be reviewed periodically as determined by Us, to make sure that Your care continues to be necessary and appropriate.

"Policy Effective Date" means the date when coverage starts under Your Policy. It is listed on the Schedule.

"Professional Homemaker Services" means services incidental to Personal Care Services and are limited to the following:

1. Home cleaning;
2. Laundry;
3. Food shopping and errands;
4. Meal preparation and clean up;
5. Transportation assistance to and from medical appointments;
6. Other services determined by Us to be appropriate.

"Qualified Long Term Care Services" means necessary diagnostic, preventive, therapeutic, curing, treating, mitigating, and rehabilitative services, and Maintenance or Personal Care Services, which:

1. Are required by a Chronically Ill individual; and
2. Are provided pursuant to a Plan of Care prescribed by a Licensed Health Care Practitioner who may be Our Quality Care Coordinator.

"Quality Care Coordinator" means a specially trained professional, who will work with You, Your family and Your Licensed Health Care Practitioner to help assess and coordinate the care and services needed by You.

"Respite Care" means temporary companion or live-in care or service provided by a Home Health Care Agency at Your Home in order to give a rest or reprieve to Your Informal Caregiver.

"Sickness" means a diagnosed illness or disease, including Alzheimer's disease and similar forms of senility, which begins while Your insurance coverage is in force and results in professional care, confinement, or service.

"Terminal Condition" is a condition which is diagnosed by Your Licensed Health Care Practitioner and which is expected to cause death within six months of such diagnosis.

"You, Your and Yourself" means the person insured under this Policy and named on the Schedule.

"We, Our, Us and Combined" means Combined Insurance Company of America.

Benefits

Information Provided in the Policy Schedule: The Schedule shows the Elimination Period, Maximum Policy Benefit, Maximum Daily Nursing Home Confinement benefit, Assisted Living Facility Care benefit, Home health care benefits and Adult Day Care Services benefit. Also, the Bed Reservation benefit, Caregiver Training benefit, Hospice Care benefit, Respite Care benefit and Emergency Response System benefit maximums are listed. It also includes optional benefit information, if applicable, and premium and general policy information.

Limitations or Conditions on Eligibility for Benefits: For benefits to be payable under this Policy, the following are required:

1. the loss must be sustained by You while the Policy is in force for Qualified Long Term Care Services;
2. confinement, care, services or training must be pursuant to a Plan of Care prescribed by a Licensed Health Care Practitioner who may be Our Quality Care Coordinator;
3. confinement, care or services must be due to Functional Incapacity or Cognitive Impairment and required because You are Chronically Ill.

Benefits will be paid subject to the Elimination Period and in accordance with the schedule of benefits, up to the stated maximum policy benefits.

Quality Care Coordination: Provides You with the knowledge, training and experience of a Quality Care Coordinator. If You require care or services due to covered Functional Incapacity or Cognitive Impairment, You, a member of Your family, or Your Licensed Health Care Practitioner must contact Us at the number shown on Your identification card. We will work with You from the start to provide You with the best options of care available.

If You choose, We will designate a Quality Care Coordinator who will evaluate Your functional abilities and needs and assist You in securing medically appropriate, quality care. The Quality Care Coordinator will assess Your specific situation, monitor the Plan of Care, identify the type and frequency of services needed, and coordinate the care You need from all sources available to You. These sources may include Your family members, Medicare, state and community resources, religious and fraternal organizations, as well as professional health care providers. This service will be provided at no cost to You.

Quality Care Coordination Appeal Procedure: You may request a formal review of Your Plan of Care or Your Quality Care Coordinator's determination of Your need for care. The request must be in writing and sent to Us within sixty (60) days after the denial. Such request must include the following information:

1. Your name;
2. Your policy number;
3. Other identifying information found on the notice from Us, if any;
4. A concise statement of issues; and
5. Any information, documents or comments that You may want to have considered.

The results of this review will be sent to You within sixty (60) days following Our receipt of Your request. In special cases an extension of time may be required. You will be notified of the reason(s) for the delay. The delay will be no more than an additional sixty (60) days.

Alternate Plan of Care: We may agree to pay benefits for services or equipment not specifically covered by this Policy or described in Your Plan of Care. These alternatives may be recommended by either You, Us or Your Quality Care Coordinator. These alternatives will be consistent with generally accepted medical practices. You or Your legal representative, Your Licensed Health Care Practitioner, and We must agree in advance that such alternatives are appropriate and acceptable. The Alternate Plan of Care benefit is subject to the Maximum Policy Benefit. Our decision to provide alternate benefits will not change or affect any of the terms or other provisions of this Policy.

Nursing Home Confinement: If You are confined in a Nursing Home, We will pay the cost You incur for such confinement, **up to** the Maximum Daily Benefit Amount shown on the Schedule.

Assisted Living Facility Confinement: If You are confined in an Assisted Living Facility, We will pay the cost You incur for such confinement, **up to** the Maximum Daily Benefit Amount shown on the Schedule.

Bed Reservation: If, during a period for which benefits are payable under this Policy for Nursing Home confinement or Assisted Living Facility confinement, You are required to be hospitalized or otherwise choose to temporarily leave the Nursing Home or Assisted Living Facility, We will pay the cost You incur to reserve Your bed in the Nursing Home or Assisted Living Facility while so hospitalized or temporarily not residing **up to** the amount and number of days shown on the Schedule. Unused days cannot be carried into the next year.

Home Health Care - Medical Services: If You require Home health care, We will pay the cost You incur for Medical Services, **up to** the Maximum Daily Benefit Amount shown on the Schedule.

Home Health Care - Personal Care or Adult Day Care Services: If You require Home health care, We will pay the cost You incur for Personal Care Services, **up to** the Maximum Daily Benefit Amount shown on the Schedule.

If you require Adult Day Care, We will pay the cost You incur for such services **up to** the Maximum Daily Benefit Amount shown on the Schedule.

Hospice Care: If You are diagnosed with a Terminal Condition and You receive Hospice Care instead of Nursing Home or Home health care, We will pay the cost You incur for such care, **up to** the daily amount shown on the Schedule.

The Hospice Care benefit is payable up to a maximum of [6] months.

Caregiver Training: We will provide benefits for the cost You incur for Caregiver Training received by an Informal Caregiver which makes it unnecessary for You to either be in a Nursing Home, Assisted Care Facility or to receive Home health care in Your Home from a paid provider, **up to** the amount shown on the Schedule.

Respite Care: We will pay a benefit for the cost You incur for each day You receive Respite Care for at least four (4) hours during that day, **up to** the amount and number of days shown on the Schedule. To receive a benefit for Respite Care You must first qualify to receive a Home Health Care - Personal Care or Adult Day Care Services benefit.

Unused days cannot be carried over into the next Calendar Year.

Emergency Response System: If benefits for Home Health Care-Medical Services or Home Health Care - Personal Services are payable under this Policy, We will pay the cost You incur for rental or lease of an Emergency Response System while You are receiving such covered Home health care **up to** the monthly amount shown on the Schedule.

Benefits payable for an Emergency Response System will be pro-rated for any period less than the entire month for which You are eligible and incur such costs.

Waiver of Premium: After Nursing Home confinement benefits or Home health care benefits have been paid by Us for ninety (90) consecutive days, You will not be required to continue to pay premiums due in order to keep this Policy in force as long as:

1. You continue to be confined in a Nursing Home and receive Nursing Home confinement benefits for the same or related Injury or Sickness for which You were confined; or
2. You continue to receive Home health care benefits for the same or related Injury or Sickness; and
3. You have not reached the Maximum Policy Benefit, as shown on the Schedule.

Once Nursing Home confinement or Home health care benefits cease, premium payments must begin again if this Policy is to remain in force.

Optional Home Health Care Increase Rider: If chosen, We will double the maximum daily amounts payable for Home health care - Medical Services and Home health care - Personal Services. The Maximum Policy Benefit, however, remains the same and does not increase.

Optional Inflation Protection Rider: If chosen, We will increase Your Maximum Daily Benefit amount at a rate of [5%] compounded annually, for each year that coverage remains continuously in force, for [up to your lifetime.] The increase amount will be based on the Maximum Daily Benefit amount in effect at the time and will automatically become effective on each Policy anniversary. The Maximum Policy Benefit will be increased accordingly.

Optional Non-forfeiture Benefit Rider: If chosen, We will establish a shortened benefit period based on the length of time the Policy was in force and subsequently lapsed according to the terms set in the rider.

Exclusions

No benefit is payable for care or service which is:

1. Free of charge in the absence of insurance; or
2. (a) reimbursable under Title 18 of the Social Security Act (Medicare) or would be so reimbursable but for the application of a deductible or coinsurance amount; or
   (b) reimbursable under any other federal or state health care plan or law, except Medicaid. We will reduce benefits payable by the dollar amount paid from the government health care plan or law to the extent that the combination of Our coverage and governmental coverage exceeds 100% of the actual charge for the covered services.
3. Provided by a member of Your Immediate Family or an individual who normally resides with You on a regular basis; or
4. Not included in Your Plan of Care; or
5. Caused by or results from:

(a) attempted suicide or intentionally self-inflicted injury; or
(b) war or any act of war, declared or undeclared; or
(c) alcoholism, drug addiction, or chemical dependency, unless as a result of medication prescribed by a Licensed Health Care Practitioner; or
(d) an Injury or Sickness for which benefits are payable under any Workers' Compensation, Employer's Liability or Occupational Disease Law; or
(e) a Mental or Nervous Disorder, with the exception of Alzheimer's disease, Parkinson's Disease or other organic brain disorders.

6. Provided outside of the United States of America or its territories or possessions or Canada.

Claim Provisions

Notice of Claim: Written notice of claim must be sent to Us at Our home office, or to Our agent, within thirty (30) days after functional disability or Cognitive Impairment begins. Such notice must include Your name and policy number. If notice cannot reasonably be given within that time, You must send the notice as soon as possible.

Written Proof of Claim: Written proof of claim must be sent to Us within ninety (90) days after functional disability or Cognitive Impairment begins. If it is not reasonably possible to give proof in the time required, Your claim is not affected if proof is sent as soon as possible. Unless You are legally incapacitated, proof must be sent no later than one (1) year after the time specified.

Quality Care Coordinator Requirement: After We receive notice of Your claim, if You have not already done so, We will notify Our Quality Care Coordinator of Your claim. Your coordinator will develop a Plan of Care under which benefits will be considered for payment. Benefits will not be payable without a Quality Care Coordinator developing Your Plan of Care.

Claim Forms: We will send You claim forms when We receive written notice of claim. If forms are not received within fifteen (15) days after written notice of claim is sent, then proof of claim will be met by giving Us a written statement of the type and the extent of the services. You must send such proof within the time limit stated in the written proof of claim provision of this Policy.

Payment of Claims: When We receive written proof of claim and determine that it is covered by this Policy, We will pay any benefits due. Benefits that provide for periodic payment will be paid monthly as We become liable. Benefits for any other loss covered by this Policy will be paid immediately.

We will pay benefits to You, if living, to providers of care or services through an assignment of benefits, or else to Your estate.

Order of Payment: The Virginia Department of Medical Assistance Services will be payor of last resort to any benefits under this policy, if you are eligible for medical assistance in Virginia.

Extension of Benefits: If You terminate Your Policy, it will not affect any claim payable under a Plan of Care that began while this Policy was in force prior to termination. Benefits will be payable pursuant to the Plan of Care, subject to the provisions of this Policy, until You have not received either Nursing Home confinement, Assisted Living Facility Care or Home health care for at least 180 consecutive days.

Effective Date, Premium Payments and Termination Provisions

Policy Effective Date: This Policy begins on the Policy Effective Date shown on the Schedule, provided You have:

1. Submitted an application for insurance satisfactory to and approved by Us; and
2. Paid the first premium due.

Insurance starts and ends at 12:01 a.m. standard time at Your Home.

Premium Payments: Premiums are the payments needed to keep this Policy in force. Premiums are payable in advance. The first one is due on the Policy Effective Date. Each subsequent

premium is due at the end of the term for which premium has been paid. The Premium Amount and the Premium Mode are shown on the Schedule.

Termination of this Policy: This Policy will end on the earliest of the following:

1. The date of Your death;
2. The end of the grace period if premium has not been paid by that date;
3. The date We receive Your written notice of termination or, if later, the date requested in Your notice; or
4. The date the Maximum Policy Benefit, as shown on the Schedule, has been paid.

Return of Unearned Premium: In the event of Your death, We will refund any premium paid for a period beyond the date of Your death.

You may cancel this Policy at any time by writing to Us. Coverage will end on the date the written notice is received, or on a later date specified by You. We will promptly return any unearned premium.

General Provisions

Entire Contract; Changes: This Policy , including the endorsements and the attached papers, if any, constitutes the entire contract of insurance. No change in this policy shall be valid until approved by an executive officer of the Company and unless such approval is endorsed hereon or attached hereto. No agent has authority to change this policy or to waive any of its provisions.

Time Limit on Certain Defenses: After this Policy has been in force for two (2) years from its Effective Date, no statement made by You on a written application, except fraudulent misstatements, shall be used to void this Policy or deny a claim that starts after the two (2) year period.

Grace Period: You may pay the premium up to thirty-one (31) days after it is due. This Policy stays in force during such time. If the premium is not paid during the grace period, this Policy will terminate. You will still owe Us the premium up to the date this Policy terminates.

Unintentional Lapse Protection: You have the right to designate an individual, in writing, in addition to Yourself to receive notification when Your Policy will terminate because of nonpayment of premiums.

We will give the person You designate notification of the impending termination at least 30 days before the date such termination will occur.

On every renewal of Your Policy, You have the right to change the designated person.

Reinstatement of this Policy: If premium is not paid before the grace period ends, this Policy will lapse. Later acceptance of the premium by Us, or by an agent authorized to accept payment, without requiring an application for reinstatement will reinstate this Policy. If this Policy lapses, We shall give You and the person, if any, designated by You to receive notices of lapse, written notice of the lapse. This notice shall be given by first class United States mail and shall not be given until thirty (30) days after the premium is due and unpaid. Notice shall be deemed to have been given as of five (5) days after the date of mailing. Later acceptance of the premium by Us, or by an agent authorized to accept payment, without requiring an application for reinstatement will reinstate this Policy.

If this Policy lapses, it may be reinstated at Our option. In order to request reinstatement You must:

1. Complete a reinstatement application; and
2. Pay all premium then due; and

3. Return items 1 and 2 to Our home office for approval.

You will be issued a conditional receipt for the premium. This Policy will be put back in force on the date We approve Your reinstatement application. If We fail to give You written notice of disapproval, this Policy will be reinstated on the forty-fifth (45th) day after the date of the conditional receipt.

The reinstated policy will cover only those services which result from:

1. An Injury sustained after; or
2. A Sickness that starts more than ten (10) days after the date of reinstatement.

In all other respects, Your rights and Our rights under this Policy will be the same as they were before this Policy ended; however, these rights are subject to an endorsement which relates to reinstatement.

If You provide Us with proof that, when this Policy lapsed, You were suffering from a Cognitive Impairment or from a loss of functional capacity, subject to the following conditions, You may reinstate this Policy without submitting to Us evidence of insurability. This option shall be available only if it is requested by You within six (6) months after the date of lapse and shall be subject to the payment of all past due premiums. If the Policy is reinstated under this option, the Policy will be considered to have remained in continuous force without lapse.

Physical Examinations: We have the right to have You examined as often as reasonably necessary while a claim is pending. Any such examinations will be made at Our expense.

Legal Actions: No legal action can be brought against Us to recover on this Policy within sixty (60) days after written proof of claim has been given as required by this Policy. No action can be brought after three (3) years from the time written proof of claim is received.

Misstatement of Age: If Your age has been misstated, the benefits payable under this Policy will be those the premium paid would have purchased at the correct age. If no coverage would have been available, We will refund any premium You have paid.

Assignment: No assignment of this Policy or its benefits, by You or Your legal representative, will affect Us unless it is in writing and sent to Us at Our home office. We are not responsible for the validity of the assignment. Any payment We make in good faith will end Our liability to the extent of the payment.

Other Insurance: You may not have duplicate long term care insurance in force with Us at any one time. You may elect which policy you choose to be effective. We will refund all premiums paid, minus any claims paid or payable, for other long term care policies in force during the same period.

Conformity with State and Tax Qualification Laws: Any provision of this Policy which, on the Policy Effective Date, is in conflict with the laws of the state in which You reside on that date or the Federal tax qualification requirements is amended to conform to the minimum requirements of such laws.