

October 5, 2021

Philip Gennace, Chair, NAIC LTCI Model Update (B) Subgroup

Dear Mr. Gennace and Subgroup Members,

The American Council of Life Insurers (ACLI)ⁱ appreciates the opportunity to comment on Sections 1 through 6 of the Long-Term Care Insurance (LTCI) Model Regulation #641.

At this time, ACLI believes that the language currently contained in Sections 1 through 6 remains flexible and compatible with the current LTCI marketplace and that new language is unnecessary. However, as the subgroup continues its review of the remaining sections of the model regulation, we recognize that changes needed to those sections could result in a need to reconsider our position regarding the opening of Sections 1 through 6.

We look forward to discussing expanding on our comments at the LTCI Model Update (B) Subgroup meeting on Wednesday, October 13th.

Sincerely,



Jan M. Graeber
Senior Actuary
ACLI

ⁱ The American Council of Life Insurers advocates on behalf of 280 member companies dedicated to providing products and services that promote consumers' financial and retirement security. Ninety million American families depend on our members for life insurance, annuities, retirement plans, LTC insurance, disability income insurance, reinsurance, dental, vision, and other supplemental benefits. ACLI represents member companies in state, federal and international forums for public policy that supports the industry marketplace and the families that rely on life insurers' products for peace of mind. ACLI members represent 95 percent of industry assets in the United States.