

## Comments Received from the State of Utah

**Section 13A(1):** 5% increase amount is likely too high in the current environment.

**Section 13B:** Most of the group policies today are non-contributory, i.e. the entire premium is paid by the certificate holder. In cases where the certificate holder pays the entire premium it would make more sense to have the offer made to the certificate holder.

**Section 13C:** It isn't clear if this Subsection applies to LTC benefits provided through annuities. In addition, given the shift in the marketplace to combo products, the issue of whether combo products need to offer inflation protection should be revisited.

**Section 18:** Is this section necessary because should the Subgroup decide to open the model for edit, it may be a good idea to check with the actuarial task forces (HATF and LATF) whether this guidance is needed. LTC reserves are addressed in other places like the *Health Insurance Reserves Model Regulation*, #10. The *Limited Long-Term Care Insurance Model Regulation*, #643, simply refers to Model #10.

**Section 19C:** As written, Subsection C exempts only life insurance policies that accelerate benefits for long-term care. It would seem that life insurance policies with extension benefits (benefits) are not exempt. Neither are annuities that provide long term care. Because the Section 19 only applies to pre rate stability policy, there might not be too many combo products to which it applies. So, this comment may not have much impact.

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