From: Bradley Boban -MDInsurance-Sent: Thursday, December 12, 2024 8:12 AM To: Koenigsman, Jane Subject: Comments on LTCI MSA Framework document

Maryland notes that the revised cost-sharing formula reduces carrier cost-sharing below a 400% needed increase, increasing the share that the subscribers must pay. This leads to a net increase in blended rate increase for those increases that are 700% or less. This is contrary to the goal which was to reduce the rate increases for the 85/25/400 cohort. It's not until the cumulative increase gets up to 750% that the proposed methodology produces a lower blended increase.

Why was it necessary to change any of the existing haircuts? Wouldn't it have been better to just add a new haircut level at 400% on top of the existing haircut levels? That would have only reduced rates for consumers and led to lower premium increases for the 85/25/400 cohort. That's would be recommendation that MD could support.



Brad Boban, ASA, MAAA Chief.Actuary Office of the Chief Actuary Maryland Insurance Administration 200 St. Paul Place, Suite 2700 Baltimore, Maryland 21202 insurance.maryland.gov bradley.boban@maryland.gov (410) 468-2065 (Office) (443) 845-3830 (Cell)

