

From: [Fairbanks, Julie](#)
To: [King, Eric](#)
Cc: [White, Scott A.](#); [Blauvelt, Julie](#); [Smith, Greg](#); [Chupp, Craig](#)
Subject: FW: Long-Term Care Actuarial (B) Working Group Exposure - Comments Due May 3
Date: Monday, May 6, 2024 3:36:21 PM
Attachments: [image001.png](#)
[Single actuarial approach comments recom 022024.pdf](#)

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Good afternoon Eric,

VA's comments are below. I apologize for submitting them a few days late.

Virginia is supportive of the development of a single MSA actuarial approach based on the concepts outlined in the attachment. In regards to the recommendations that the WG is planning to incorporate into the single actuarial method, VA would like to provide the following suggestions:

Regarding #4 and the catch up provision for attaining a similar rate level upon states, VA would prefer that the MSA team continue to provide recommended rate increases for approval and separately provide catch up percentages for individual states. This will allow the states to evaluate the specifics of previous rate increase approvals and whether to apply catch up percentages .

Regarding # 8, we agree with having a solvency provision for state consideration but it should be separate from the basic analysis.

In addition to the recommendations in the attached, it would be helpful for states to have a clear understanding of how the MSA team arrives at a recommended increase so that each state can determine whether the recommendation complies with their regulatory requirements and have the ability to apply the same approach to other filings to ensure consistency. This would be especially helpful when considering multiple filings from the same insurer.

Thank you,
Julie

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From: King, Eric <EKing@naic.org>

Sent: Sunday, March 17, 2024 10:36 AM

To: King, Eric <EKing@naic.org>

Subject: Long-Term Care Actuarial (B) Working Group Exposure - Comments Due May 3

To: Long-Term Care Actuarial (B) Working Group Members, Interested Regulators, and Interested Parties

The Working Group requests comments on the Minnesota Approach with any suggested adjustments as a candidate for a Single LTCI Multistate Rate Review Approach. The Minnesota Approach is described here: <https://content.naic.org/sites/default/files/documents/lhci-msa-framework.pdf>

Suggested adjustments should be related to the concepts contained in the attached recommendation on a single MSA actuarial approach after regulator feedback document.

Please provide comments to eking@naic.org by Friday, May 3.

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