

From: Unger - DORA, Eric <eric.unger@state.co.us>
Sent: Friday, April 21, 2023 9:07 PM
To: King, Eric
Cc: Batista, Deborah; Brady, Sean; Peter Nugent - DORA
Subject: Fwd: Long-Term Care Actuarial (B) Working Group Exposures - Comments due April 24
Attachments: MSA Framework suggestions from Colorado.xlsx

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Eric,

Colorado is pleased to provide our comments on the documents linked in your email below. They've been approved by Commissioner Conway and we're happy to discuss them with you and the NAIC Actuarial (B) Working Group if desired.

- Our suggested improvements to the HATF-adopted Consolidated, Most Commonly Asked Questions – States' LTC Rate Increase Reviews checklist and MSA Supplemental information checklist include:
 - Suggest writing the MSA report for an non-actuarial audience with actuarial details in an Appendix.
 - Suggest a more thorough discussion of the reasonability analysis used in evaluating RBO's. Was the analysis qualitative, quantitative, or both?
 - Additional items that CO suggests asking insurers to provide on the MSA checklist are in the '*New in MSA checklist*' tab of the attached file. We understand these are subject to MSA approval.
- Our comments related to the Minnesota and Texas actuarial approaches as described in the NAIC Long-Term Care Insurance Multi State Rate Review Framework document include:
 - Suggest picking one methodology to review the filings; Large discrepancies between the results of the MN & TX methodologies reduces confidence in the final conclusion

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From: **Batista - DORA, Deborah** <deborah.batista@state.co.us>
Date: Wed, Apr 19, 2023 at 10:56 AM

Subject: Fwd: Long-Term Care Actuarial (B) Working Group Exposures - Comments due April 24

To: Eric Unger - DORA <eric.unger@state.co.us>, Peter Nugent - DORA <peter.nugent@state.co.us>, Sean Brady - DORA <sean.brady@state.co.us>

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

Date: Wed, Feb 22, 2023 at 10:25 AM

Subject: Long-Term Care Actuarial (B) Working Group Exposures - Comments due April 24

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

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

1. Please provide comments by April 24 on suggested improvements, including additions or streamlining of the Health Actuarial Task Force-adopted Consolidated, Most Commonly Asked Questions – States' LTC Rate Increase Reviews checklist and MSA Supplemental information checklist.

These checklists are contained in the Information Checklist section of the NAIC Long-Term Care Insurance Multistate Rate Review Framework document, located at https://content.naic.org/sites/default/files/inline-files/MSA%20Framework_121221_TF%20Adopted.pdf

2. Please provide comments by April 24 related to the Minnesota and Texas actuarial approaches as described in the NAIC Long-Term Care Insurance Multistate Rate Review Framework document, located at https://content.naic.org/sites/default/files/inline-files/MSA%20Framework_121221_TF%20Adopted.pdf

Please identify issues, including types of cases where improvements to the approaches may lead to more consistent results in line with goals, for example balancing fairness to consumers with helping to prevent further financial distress to insurers.

Comments should be submitted to [Eric King](#) by Monday, April 24

Thanks,

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