8770 W Bryn Mawr Ave, Suite 1000
Chicago, IL 60631
P +1-888-697-3900
SOA.ORG

August 3, 2026

To: Rachel Hemphill, Chair, Life Actuarial (A) Task Force

Re: 2027 Generally Recognized Expense Table (GRET) – SOA Research Institute Analysis

Dear Rachel:

As in previous years, the Society of Actuaries (SOA) Research Institute expresses its thanks to NAIC staff for their assistance and responsiveness in providing Annual Statement expense and unit data for the 2027 GRET analysis for use with individual life insurance sales illustrations. The analysis is based on expense and expense-related information reported on each company's 2024 and 2025 Annual Statements. This project has been completed to assist the Life Actuarial Task Force (LATF) in considering potential revisions to the GRET that could become effective for the calendar year 2027. This memo describes the analysis and resultant findings.

NAIC staff provided Annual Statement data for life insurance companies for calendar years 2024 and 2025. This included data from 712 companies in 2024 and 702 companies in 2025. This decrease resumes the trend of small decreases from year to year. Of the total companies, 377 were in both years and passed the outlier exclusion tests and were included as a base for the GRET factors (380 companies passed similar tests last year).

Approach Used

The methodology for calculating the recommended GRET factors based on this data is similar to that of the last several years. The general methodology was last altered in 2015. The changes made then can be found in the recommendation letter sent to LATF on July 30, 2015. One change we made in this year’s analysis, through the input and review with the SOA Committee on Life Insurance Company Expenses (CLICE), was to combine the Niche Marketing and Other Distribution categories together. This combination has also been extended to the upcoming SOA Research Institute / LIMRA expense study that we plan on releasing in 2027.

To calculate updated GRET factors, the average of the factors from the two most recent years (2024 and 2025 for those companies with data available for both years) of Annual Statement data was used. For each company, an actual-to-expected (A/E) ratio was calculated. Companies with ratios that fell outside predetermined parameters were excluded. This process was completed three times to stabilize the average rates. The boundaries of the exclusions have been modified from time to time; however, there were no adjustments made this year. Unit expense seed factors (the seeds for all distribution channel categories are the same), as shown in Appendix B, were used to compute total expected expenses. Thus, these seed factors were used to implicitly allocate expenses between acquisition and maintenance expenses, as well as among the three acquisition expense factors (on a direct or ceded reinsurance basis).

Companies were categorized by distribution channel (four categories were used as described in Appendix A included below) through either self-reporting to the SOA, or through CLICE and SOA staff analysis. Effort was made to assign these companies a distribution channel. If a distribution channel could not be determined, the company was placed in the “Other” category.

Any advice or assistance from LATF in future years to increase the response rate to the surveys of companies that submit Annual Statements or to reduce the number of companies in the “Other” category would be most welcome. The intention is to continue surveying the companies in future years to enable the enhancement of this multiple distribution channel information.

Companies were excluded from the analysis if in either 2024 or 2025, (1) their A/E ratios were considered outliers, often due to low business volume, (2) the average first year and single premium per policy were more than $40,000, (3) they are known reinsurance companies, or (4) their data were not included in the data supplied by the NAIC. To derive the overall GRET factors, the unweighted average of the remaining companies’ A/E ratios for each respective category was calculated. The resulting factors were rounded, as shown in Table 1.

The Recommendation

The above methodology results in the proposed 2027 GRET values are shown in Table 1. To facilitate comparisons, the current 2026 GRET factors are shown in Table 2. Further characteristics of the type of companies represented in each category are included in the last two columns in Table 1, including the average premium per policy issued and the average face amount ($000s) per policy issued.

TABLE 1

PROPOSED 2027 GRET FACTORS (BASED ON AVERAGE OF 2024/2025 DATA)

DESCRIPTION	Acquisition per Policy	Acquisition per Unit	Acquisition per Premium	Maintenance per Policy	Companies Included	Average Premium Per Policy Issued During Year	Average Face Amt (000) Per Policy Issued During Year
Independent	$212	$1.20	53%	$64	174	$4,696	$339
Career	$235	$1.30	59%	$71	101	$1,592	$207
Direct Marketing	$289	$1.50	72%	$87	25	$767	$73
Other*	$139	$0.80	35%	$42	77	$782	$31
* Includes most companies that were in Niche Marketing in prior years’ GRET factors and companies that did not respond to this or prior year surveys for which a distribution channel could not be determined.					377		

TABLE 2

CURRENT 2026 GRET FACTORS (BASED ON AVERAGE OF 2023/2024 DATA)

DESCRIPTION	Acquisition per Policy	Acquisition per Unit	Acquisition per Premium	Maintenance per Policy	Companies Included	Average Premium Per Policy Issued During Year**	Average Face Amt (000) Per Policy Issued During Year**
Independent	$217	$1.20	54%	$65	150	$4,503	$363
Career	$238	$1.30	60%	$72	95	$2,022	$251
Direct Marketing	$263	$1.40	65%	$79	24	$706	$68
Niche Marketing	$126	$0.70	32%	$38	25	$654	$15
Other*	$175	$1.00	44%	$53	86	$483	$35
* Includes companies that did not respond to this or prior year surveys ** Restated to aggregate averages rather than the average per company and to exclude companies that issued no new policies.					380		

In previous recommendations, an effort was made to reduce volatility in the GRET factors from year to year by limiting the yearly change in GRET factors to about 10% of the prior value. The changes from the 2026 GRET were reviewed to ensure that a significant change was not made in this year’s GRET recommendation with the exception of the one-time reduction exceeding -10% for companies in the Other category in both years due to the combination of the Niche Marketing and Other distribution channels.

The GRET factors for the Direct Marketing and Other distribution channels exceeded the +10% threshold and were, therefore, capped (Note: factors for Other were capped at +10% of the prior year's factors for Niche Marketing). This action limited volatility and ensured consistency for illustration purposes despite inherent fluctuations in smaller-sample, high-variability channels. No capping was required for Independent or Career channels.

Usage of the GRET

This year's survey, responded to by each company's Annual Statement correspondent, included a question regarding whether the 2026 GRET table was used in its illustrations by the company. Last year, 34% of responders indicated their company used GRET for sales illustration purposes. This year, 25% of responding companies indicated they used the 2026 GRET for sales illustration purposes. Usage levels have returned to the historical range of around 30%. The responses covered all major distribution methods, with 50% from Independent and 6% from Career; no respondents from Direct Marketing or Other reported using the GRET Factors. Based on the information received over the last several years, the variation in GRET usage appears to be in large part due to the relatively small sample size and different responders to the surveys.

We hope LATF finds this information helpful and sufficient for consideration of a potential update to the GRET. If you require further analysis or have questions, please contact Dale Hall at 847-273-8835.

Sincerely,

SOCIETY OF ACTUARIES RESEARCH INSTITUTE

R. Dale Hall

08/03/2026

By: R. Dale Hall, FSA, MAAA, CERA, CFA
Managing Director, Research
Society of Actuaries Research Institute

Date

Yutaro Seki

08/03/2026

By: Yutaro Seki, FSA, EA, MAAA
Experience Studies Actuary
Society of Actuaries Research Institute

Date

Appendix A – Distribution Channels

The following is a description of distribution channels used in the development of recommended 2027 GRET values:

Independent – Business written by a company that markets its insurance policies through an independent insurance agent or insurance broker not primarily affiliated with any one insurance company. These agencies or agents are not employed by the company and operate without an exclusive distribution contract with the company. These include most personal producing general agent (PPGA) arrangements, Independent Marketing Organizations, and Independent Multi-Level Marketing organizations.

Career – Business written by a company that markets insurance and investment products through a sales force primarily affiliated with one insurance company. These companies recruit, finance, train, and often house financial professionals who are typically referred to as career agents or multi-line exclusive agents.

Direct Marketing – Business written by a company that markets its own insurance policies direct to the consumer through methods such as direct mail, print media, broadcast media, telemarketing, retail centers and kiosks, internet, or other media. No direct field compensation is involved.

Other – Business written outside of the three categories above. Examples include home service, pre-need, and worksite. This category also includes companies that did not respond to the survey and whose distribution channel could not be determined.

Appendix B – Unit Expense Seeds

The expense seeds used in the 2014 and prior GRETs were differentiated between branch office and all other categories, due to the results of a relatively old study which had indicated that branch office acquisition cost expressed on a per Face Amount basis was about double that of other distribution channels. Due to the elimination of the branch office category in the 2015 GRET, non-differentiated unit expense seeds have been used in the current and immediately prior studies.

The unit expense seeds used in the 2027 and 2026 GRET recommendations were based on the average of the 2006 through 2010 Annual SOA expense studies. These studies differentiated unit expenses by type of individual life insurance policy (term and permanent coverages). As neither the GRET nor the Annual Statement data provided differentiates between these two types of coverage, the unit expense seed was derived by judgment based on this information. The following shows the averages derived from the Annual SOA studies and the seeds used in this study. Beginning with the 2020 Annual Statement submission, this information will become more readily available.

2006-2010 (AVERAGE) CLICE STUDIES:

	Acquisition/ Policy	Acquisition/ Face Amount (000)	Acquisition/ Premium	Maintenance/ Policy
Term				
Weighted Average	$149	$0.62	38%	$58
Unweighted Average	$237	$0.80	57%	$76
Median	$196	$0.59	38%	$64
Permanent				
Weighted Average	$167	$1.43	42%	$56
Unweighted Average	$303	$1.57	49%	$70
Median	$158	$1.30	41%	$67

CURRENT UNIT EXPENSE SEEDS:

	Acquisition/ Policy	Acquisition/ Face Amount (000)	Acquisition/ Premium	Maintenance/ Policy
All distribution channels	**$200**	**$1.10**	**50%**	**$60**

Society of Actuaries Research Update to LATF

August 10, 2026

R. Dale Hall, FSA, MAAA, CFA, CERA
Managing Director, Research

Yutaro Seki, FSA, EA, MAAA
Experience Studies Actuary

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2027 GRET Recommendation

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Background

- Recommended Generally Recognized Expense Table (GRET) for 2027 was based on certain information reported in companies' 2024 and 2025 Annual Statements provided by the NAIC.
- Other than the combination of two distribution channels (Niche Marketing and Other), the general methodology we followed is similar to prior years.
- 2027 GRET factors are slightly lower than 2026 factors for majority of companies in the analysis (377 total companies).

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Methodology: Expense Analysis and Distribution Channels

Calculate Company Actual to Expected	- Actual expense data from NAIC-provided Annual Statements. - Apply seed factors to company data to calculate expected expenses. - Compare Actual to Expected Expenses
Remove Outliers	- Calculate medians by distribution channel. - Remove companies above 350% or below 10% of the median.
Primary Distribution Channel	- Survey sent by SOA Research Institute to gather distribution channel and/or review distribution channel previously gathered.
Determine Final Factors	- For each distribution channel, determine the average A/E. - Multiply the average A/E over the past two years times the Seed value to determine the final factor. (A rounded change cap of ± 10% is applied.)

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Companies Considered in Calculation

Year	Starting Companies	Reinsurers (Removed)	De minimis Expenses (Removed)	Companies Considered
2024	712	(56)	(133)	523
2025	702	(67)	(129)	506

- Started with data from the NAIC for all companies' Blue Book values.
- Removed Reinsurers.
- Removed companies with no reported expenses.

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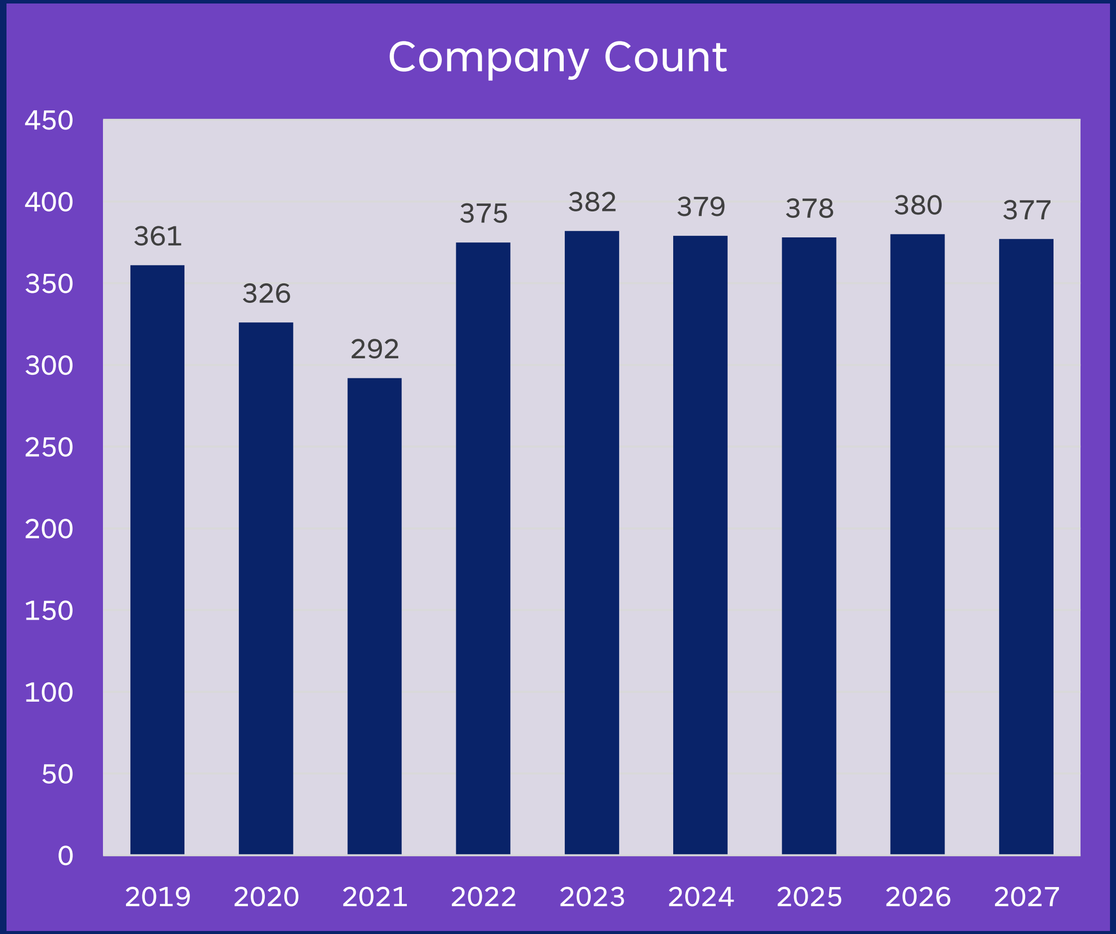
Final Used Companies in 2027 Factor Calculation

Year	Companies Considered	Outlier Exclusion	Removed for Large Premium per Policy	Not Kept in Other Calculation Year	Final Companies
2024	523	(113)	(8)	(22)	380
2025	506	(93)	(9)	(27)	377

- Started with considered companies.
- Removed companies that failed exclusion tests.
- Removed companies with large premium per policy (greater than $40K).
- Removed companies that were not kept in other calculation year.

Final Companies Study

- Final company count used in the 2027 GRET calculation was 377
- Slight decrease from the 380 in the 2026 GRET
- Over the past five years, the company count has been very steady, between 375 and 380.



Current 2026 GRET Factors

Current 2026 GRET FACTORS (based on average of 2023/2024 data)					
Description	Acquisition per Policy	Acquisition per Unit	Acquisition per Premium	Maintenance per Policy	Company Count
Independent	$217	$1.20	54%	$65	150
Career	$238	$1.30	60%	$72	95
Direct Marketing	$263	$1.40	65%	$79	24
Niche Marketing	$126	$0.70	32%	$38	25
Other*	$175	$1.00	44%	$53	86
* Includes companies that did not respond to this or prior year surveys. Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, there is a one-time reduction from 2026 to 2027 exceeding 10% for companies in the Other category in both years due to the combination of Niche Marketing and Other.					380

Company Counts: 2026 into 2027

Description	2026 Company Count	2027 Company Count
Independent	150	174
Career	95	101
Direct Marketing	24	25
Niche Marketing	25	----
Other*	86	77
Total	380	377

Acquisition per Policy Factor Comparison

Comparison to Prior Years					
Description	2025	Percentage Change	2026	Percentage Change	2027
Independent	$204	6%	$217	-2%	**$212**
Career	$227	5%	$238	-1%	**$235**
Direct Marketing	$239	10%	$263	10%	**$289**
Niche Marketing*	$131	-4%	$126	10%	**$139**
Other**	$159	10%	$175	-21%	**$139**

*Niche Marketing category was eliminated beginning with 2027 GRET Factors.

** For 2025 and 2026, includes companies that did not respond to this or prior year surveys. For 2027, includes most companies that were in Niche Marketing in prior years' GRET Factors.

Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, there is a one-time reduction from 2026 to 2027 exceeding 10% for companies in the Other category in both years due to the combination of Niche Marketing and Other.

Acquisition per Unit Factor Comparison

Comparison to Prior Years					
Description	**2025**	**Percentage Change**	**2026**	**Percentage Change**	**2027**
Independent	$1.10	9%	$1.20	0%	**$1.20**
Career	$1.20	8%	$1.30	0%	**$1.30**
Direct Marketing	$1.30	8%	$1.40	7%	**$1.50**
Niche Marketing*	$0.70	0%	$0.70	14%	**$0.80**
Other**	$0.90	11%	$1.00	-20%	**$0.80**

*Niche Marketing category was eliminated beginning with 2027 GRET Factors.
** For 2025 and 2026, includes companies that did not respond to this or prior year surveys. For 2027, includes most companies that were in Niche Marketing in prior years' GRET Factors.
Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, there is a one-time reduction from 2026 to 2027 exceeding 10% for companies in the Other category in both years due to the combination of Niche Marketing and Other.

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Acquisition per Premium Factor Comparison

Comparison to Prior Years					
Description	**2025**	**Percentage Change**	**2026**	**Percentage Change**	**2027**
Independent	51%	6%	54%	-2%	**53%**
Career	57%	5%	60%	-2%	**59%**
Direct Marketing	59%	10%	65%	11%	**72%**
Niche Marketing*	33%	-3%	32%	9%	**35%**
Other**	40%	10%	44%	-20%	**35%**

*Niche Marketing category was eliminated beginning with 2027 GRET Factors.

** For 2025 and 2026, includes companies that did not respond to this or prior year surveys. For 2027, includes most companies that were in Niche Marketing in prior years' GRET Factors.

Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, there is a one-time reduction from 2026 to 2027 exceeding 10% for companies in the Other category in both years due to the combination of Niche Marketing and Other.

Maintenance per Policy Factor Comparison

Comparison to Prior Years					
Description	**2025**	**Percentage Change**	**2026**	**Percentage Change**	**2027**
Independent	$61	7%	$65	-2%	**$64**
Career	$68	6%	$72	-1%	**$71**
Direct Marketing	$72	10%	$79	10%	**$87**
Niche Marketing*	$39	-3%	$38	11%	**$42**
Other**	$48	10%	$53	-21%	**$42**

*Niche Marketing category was eliminated beginning with 2027 GRET Factors.

** For 2025 and 2026, includes companies that did not respond to this or prior year surveys. For 2027, includes most companies that were in Niche Marketing in prior years' GRET Factors.

Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, there is a one-time reduction from 2026 to 2027 exceeding 10% for companies in the Other category in both years due to the combination of Niche Marketing and Other.

Recommendation for 2027 GRET Factors (Original)

Proposed 2027 GRET FACTORS (based on average of 2024/2025 data)					
Description	**Acquisition per Policy**	**Acquisition per Unit**	**Acquisition per Premium**	**Maintenance per Policy**	**Company Count**
Independent	$212	$1.20	53%	$64	174
Career	$235	$1.30	59%	$71	101
Direct Marketing	$289	$1.50	72%	$87	25
Other*	$139	$0.80	35%	$42	77
* Includes most companies that were in Niche Marketing in prior years' GRET Factors. Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, there is a one-time reduction from 2026 to 2027 exceeding 10% for companies in the Other category in both years due to the combination of Niche Marketing and Other.					377

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Acquisition per Policy Factor Comparison

Comparison to Prior Years					
Description	2025	Percentage Change	2026	Percentage Change	2027
Independent	$204	6%	$217	-2%	**$212**
Career	$227	5%	$238	-1%	**$235**
Direct Marketing	$239	10%	$263	10%	**$289**
Niche Marketing*	$131	-4%	$126	25%	**$158**
Other**	$159	10%	$175	-10%	**$158**

*Niche Marketing category was eliminated beginning with 2027 GRET Factors.
** For 2025 and 2026, includes companies that did not respond to this or prior year surveys. For 2027, includes most companies that were in Niche Marketing in prior years' GRET Factors.
Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, the limit was disregarded for the combined Niche Marketing and Other category for 2027.

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Acquisition per Unit Factor Comparison

Comparison to Prior Years					
Description	**2025**	**Percentage Change**	**2026**	**Percentage Change**	**2027**
Independent	$1.10	9%	$1.20	0%	**$1.20**
Career	$1.20	8%	$1.30	0%	**$1.30**
Direct Marketing	$1.30	8%	$1.40	7%	**$1.50**
Niche Marketing*	$0.70	0%	$0.70	29%	**$0.90**
Other**	$0.90	11%	$1.00	-10%	**$0.90**

*Niche Marketing category was eliminated beginning with 2027 GRET Factors.

** For 2025 and 2026, includes companies that did not respond to this or prior year surveys. For 2027, includes most companies that were in Niche Marketing in prior years' GRET Factors.

Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, the limit was disregarded for the combined Niche Marketing and Other category for 2027.

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Acquisition per Premium Factor Comparison

Comparison to Prior Years					
Description	**2025**	**Percentage Change**	**2026**	**Percentage Change**	**2027**
Independent	51%	6%	54%	-2%	**53%**
Career	57%	5%	60%	-2%	**59%**
Direct Marketing	59%	10%	65%	11%	**72%**
Niche Marketing*	33%	-3%	32%	22%	**39%**
Other**	40%	10%	44%	-11%	**39%**

*Niche Marketing category was eliminated beginning with 2027 GRET Factors.
** For 2025 and 2026, includes companies that did not respond to this or prior year surveys. For 2027, includes most companies that were in Niche Marketing in prior years' GRET Factors.
Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, the limit was disregarded for the combined Niche Marketing and Other category for 2027.

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Maintenance per Policy Factor Comparison

Comparison to Prior Years					
Description	**2025**	**Percentage Change**	**2026**	**Percentage Change**	**2027**
Independent	$61	7%	$65	-2%	**$64**
Career	$68	6%	$72	-1%	**$71**
Direct Marketing	$72	10%	$79	10%	**$87**
Niche Marketing*	$39	-3%	$38	24%	**$47**
Other**	$48	10%	$53	-11%	**$47**

*Niche Marketing category was eliminated beginning with 2027 GRET Factors.

** For 2025 and 2026, includes companies that did not respond to this or prior year surveys. For 2027, includes most companies that were in Niche Marketing in prior years' GRET Factors.

Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, the limit was disregarded for the combined Niche Marketing and Other category for 2027.

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Recommendation for 2027 GRET Factors (Updated)

Proposed 2027 GRET FACTORS (based on average of 2024/2025 data)					
Description	Acquisition per Policy	Acquisition per Unit	Acquisition per Premium	Maintenance per Policy	Company Count
Independent	$212	$1.20	53%	$64	174
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Other*	$158	$0.90	39%	$47	77
* Includes most companies that were in Niche Marketing in prior years' GRET Factors. Note: All values reflect capped final factors (±10% annual change limit). Rounding may result in the final change being slightly outside of the limit. In addition, the limit was disregarded for the combined Niche Marketing and Other category for 2027.					377

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Reference: Expense Seed Factors

- Based on averages from 2006–2010 SOA studies of term and permanent products.
- Blended, non-differentiated seeds used across all channels since 2015.

	Acquisition per Policy	Acquisition per Unit	Acquisition per Premium	Maintenance per Policy
Term				
• Weighted Average	$149	$0.62	38%	$58
• Unweighted Average	$237	$0.80	57%	$76
• Median	$196	$0.59	38%	$64
Permanent				
• Weighted Average	$167	$1.43	42%	$56
• Unweighted Average	$303	$1.57	49%	$70
• Median	$158	$1.30	41%	$67
Current Seed Factors	**$200**	**$1.10**	**50%**	**$60**

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Additional Survey Results: GRET Usage

Percentage of Companies that use GRET Factors	
Survey Year	**Percentage**
2025	25%
2024	34%
2023	44%
2022	35%
2021	31%
2020	29%
2019	26%
2018	28%
2017	30%

Annual industry survey on GRET factor usage for individual life sales illustrations.

The results show that usage among the survey respondents remains in the 30% range for the past nine years.

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Questions?

Experience Studies

Project Name	Link/Expected Completion Date
2020-2024 Individual Payout Annuity Mortality Experience Study	https://www.soa.org/resources/experience-studies/2026/2020-24-individual-payout/
2015-2024 Deferred Annuity Mortality Study	8/31/2026
2024-2025 Registered Index-Linked Annuity Policyholder Behavior	9/30/2026
2018-2024 Individual Life Mortality Study	10/31/2026
2009-2024 Post-Level Term Mortality and Lapse	12/15/2026
ILEC SI AUW Underwriting	6/30/2027

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Practice Research

Project Name	Objective	Link/Expected Completion Date
Complex Assets in Insurance and Annuity Industries	Examine the use of complex assets in the life and annuity industry compared to traditional public corporate bonds	https://www.soa.org/resources/research-reports/2026/complex-assets-insurance-annuities/
Fairness Metrics for Life Insurance	Identify and discuss a variety of quantitative metrics that could be used to evaluate fairness of life insurance products under different definitions of fairness	https://www.soa.org/resources/research-reports/2026/fairness-metrics-life-insurance/
International Reinsurance Landscape Overview for U.S. Life & Annuities	Examine the offshore reinsurance landscapes	https://www.soa.org/resources/research-reports/2026/international-reinsurance-landscape-overview/
2025 Mortality Improvement Assumption Survey	Update of 2022 MI survey	8/14/2026
Quantifying Mortality and Morbidity Impacts from Climate Risks: A Practical Framework for Decision Making	Quantifying Mortality and Morbidity Impacts from Climate Risks: A Practical Framework for Decision Making	8/14/2026
Criminal Histories and Mortality	Examine the link between individuals with a criminal history and mortality	8/31/2026
Impact of AI Supported UW on Mortality Slippage - Report	Get a holistic and in-depth understanding of the industry's current approaches to AI supported underwriting and its impacts on mortality slippage	8/31/2026
Considerations in Developing Combination LTC Products	Combo LTC analysis	9/30/2026
Mortality by Socioeconomic Category through 2024	Update of life tables by socioeconomic decile through 2024	9/30/2026
Mortality by Socioeconomic-Demographic Analysis - Collection of Analyses	Collection of analyses of county-level mortality variations by socioeconomic and demographic characteristics that are both methodologically rigorous and practically informative	9/30/2026

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