

Survey of State Review Processes of LTC Riders to Life Products and Annuities

At the 2025 Fall National Meeting, Commissioner Gaines, Chair of the Senior Issues (B) Task Force, asked for a survey on how states process long-term care (LTC) riders to life and annuity products so that the Task Force can better understand how they are being handled across the states. The purpose is NOT to categorize any state's process as right or wrong but rather to see what the landscape is out there on reviewing these policy products. Below are the results of that survey.

State	When your state receives a filing of a life or annuity product with an LTC rider, does your state review the filing as a single filing or does your state review the life/annuity produce and the LTC rider separately?	Whether your state reviews said filing as one unit or separates them, is there any review of whether the LTC component meets LTC consumer protections?	If the LTC rider is reviewed for compliance with LTC consumer protections, are they treated the same as any other LTC product or are only some provisions applied? Explain.	Does your state allow rates to be changed on a traditional life/annuity policy? If yes, are the riders considered in play?	Notes
Alabama	The insurer may choose to submit the life or annuity product in the same filing as the	The LTC component is reviewed by analysts to ensure compliance.	The LTC riders are reviewed to ensure compliance with Alabama's LTC statutes, same as	Alabama does not review rates for life and annuity.	

	LTC rider or in a separate filing. Each line of insurance is reviewed based on relevant statutes and regulations.	Actuaries may review some filings as well.	any other LTC product.		
Alaska	Statutes and regulations that affect each line of insurance are considered in the review	We review as one filing, but statutes and regulations of separate lines are reviewed for compliance. Yes.	Yes, in so far as our LTC regulations apply. While regulations generally apply to the review of both the riders and LTC policies, the following do not apply. a. In Alaska's non-forfeiture regulations, 3 AAC 28.582 (a) specifically states that the non-forfeiture requirement does not apply to life insurance policies containing accelerated LTC benefits. Since a LTC rider is dependent on the base life insurance policy, lapsation of the life insurance policy would mean	Alaska does not review rates for life and annuity	

			termination of the LTC benefit. Since a terminated base policy to which computation of the acceleration and the source of LTC benefit is no longer active, the LTC non-forfeiture benefit is not required. b. Our LTC rate review only applies to policies and certificates and not to riders. Where the base policies are non LTC and LTC features are only part of the policy, both standalone riders and hybrid policies do not require LTC rate review regardless of issue date		
Arizona	Separately	Yes	All LTC requirements directly associated with benefits are applied, however, there are some instances in which policy structure, such as	Not filed	

			policy summaries, do not align with the base policy requirements and therefore are not applied.		
Arkansas	Separately	Yes	LTC riders are viewed the same as LTC policies.	Our state does not review rates for life and annuity policies.	
California	The insurer may choose to submit the life or annuity product in the same filing as the LTC rider or in a separate filing. Whether included in a single filing or separate filings, the base life/annuity product and LTC rider are considered parts of the same contract for insurance. Any portion of the life/annuity product that is material to the LTC rider is subject to LTC requirements in addition to any life/annuity requirements; any portion of the life/annuity that is	The LTC rider and any portion of the life/annuity product that is material to the LTC rider are reviewed for compliance with LTC insurance requirements, except that a small number of provisions of California's Insurance Code do not apply to an accelerated death benefit for long-term care. Most notably, the requirements to offer an inflation protection benefit and to provide a personal worksheet at the time of application do not apply to an accelerated death benefit for long-term care.	The LTC rider is treated the same as any other LTC product, except that a small number of provisions of California's Insurance Code do not apply to an accelerated death benefit for long-term care. Most notably, the requirements to offer an inflation protection benefit and to provide a personal worksheet at the time of application do not apply to an accelerated death benefit for long-term care.	Yes, California allows life and annuity rates to be changed. Rates for an LTC rider, including the initial rate filing and any rate increase request, are subject to the same actuarial review as any other LTC product. Both the initial rate filing and any rate increase request for the LTC rider would be subject to prior approval.	

	unrelated to the LTC rider is subject to life/annuity requirements only.				
Colorado	Colorado's Bulletin B-4.1 states that life insurers writing life or annuity insurance are not required to file rates or policy forms with the Division. Therefore, Colorado only evaluates the LTC part of the filing. Our analysis ignores the life/annuity part.	Yes, for the LTC component, we attempt to achieve actuarial equivalence in all benefit options to policyholders facing rate increases. But, this is difficult to define and even more difficult to determine. We also ensure written communication to policyholders is clear; we are especially sensitive to this as LTC policyholders are older and the product is complex and there may be future options available on policy when the policyholder is even older.	The LTC rider is treated the same as any other LTC product in our consumer protection checks.	Yes. We do not evaluate rate changes for life/annuity policies, but these changes are allowed. Any changes in LTC rates, whether on base or rider, must be filed with Colorado (or with Compact).	
Connecticut	We let it remain as a single filing in SERFF, but most often the LTC riders come in separately (as a new rider on an already approved life/annuity form). We do review the	Yes	They are reviewed to make sure they meet LTC consumer protections. They are treated in the same way any LTC policy due to definitions of LTC	Connecticut does not review rates for life & annuity, so No to first question. Rates are allowed to be changed, if renewability allows, on the riders. Almost all of the Extension of Benefit LTC Riders have come in as Non-cancellable, which does not allow a change of rates	

	base product and rider differently, as we recognize the uniqueness of the LTC rider. Connecticut has specific regulations that pertain to LTC riders, Acceleration and Extension of Benefit riders.		benefits in our regulations.		
Delaware	DE reviews as a single filing (as submitted), however applicable statutes & regulations would apply to each LOI. The life/annuity is reviewed as well as the LTC rider to confirm compliance.	Yes, our analysts review the LTC component to ensure compliance. In some filings, our Actuaries may review as well.	LTC riders are treated the same as other LTC products. DE is interested in creating a checklist similar to what other states use for our analysts and company filers.	Any changes to rates are reviewed and approved by Actuaries.	
District of Columbia	The Department reviews the life and annuity forms using life/annuity regulations and policies and the long-term care rider using long-term care insurance regulations and policies.	The long-term care rider review includes compliance with the Code of the District of Columbia Chapter 36.	Long-term care policies and riders have the same review process.	Traditional life and annuity products are not allowed to change rates. Long-term care rider rates are allowed to change subject to Department review and approval.	

Florida					
Georgia	We could accept a life/annuity product with an LTC rider as a single SERFF filing, but we would review components separately. We could get acceleration-type riders intended to be characterized as Long Term Care, but which may not fully meet Georgia law and Rule requirements, which last changed significantly in 2007-8. Ga. O.C.G.A. 33-42-4(5) definitions recognize Life policies or Riders in potential LTC context, but <u>not</u>	Yes, definitely. We would review proposed LTC benefits separately for compliance points on many issues, including consumer protections	OCI attempts to treat LTC Riders the same, when possible. Georgia's Commissioner is granted potential powers under Rule 120-2-16-.17 Discretionary Powers...in the best interest of insureds...necessary to develop an innovative and reasonable approach for insuring LTC...or the modification or suspension of a Rule is necessary to permit LTC insurance to be sold as a part of, or in conjunction with another insurance product.	Generally, Georgia laws and rules do not provide for the Commissioner to perform structured rate review of Life or Annuity Policies. However, specific Georgia laws and rules provide for the Commissioner to regulate Long Term Care coverage and its rates, and provide loss ratio standards, rate stability and other consumer protections. To date, we don't have actual experience with Life coverage based LTC proposed rate increase filings.	

	Annuity-based coverage.				
Hawaii	1. Separately*, if the rider is optional. 2. Together*, if the rider cannot be detached from the life product. * Carrier must file under a LTC TOI.	YES	Yes, LTC riders must meet the LTC consumer protection requirements of stand- alone LTC products, except as not required by law for combo products. Hawaii Revised Statute §431:10H-114.	Yes, without approval. Hawaii does not review rates for life and annuity. However, as LTC riders cannot exist without the underlying life/annuity policy, the state reserves the right to review those rates.	The underlying life policy may not have an age reduction that reduces the LTC benefit provided by the rider.
Idaho	Idaho reviews these as single filings with separate code and administrative rule for both. While the life/annuity policy governs the rider, the rider must still be compliant with Idaho code and administrative rules for LTC in order to be accepted.	LTC riders are reviewed to ensure they meet similar requirements to standalone LTC products.	Under most circumstances, Idaho requires riders to meet the same standards as a standalone policy. Riders may use the policy they're attached to in order to govern terms used however the overall content must still meet the same standard as a standalone LTC product.	Idaho does not have a statute preventing rate changes on traditional life/annuity policies, riders may change rates so long as the rate is justified	

Illinois	The product and rider are reviewed separately, applying the applicable Life or Annuity statutes and regs to the base product, and the LTC statutes and regs to the rider.	Yes, the LTC component is reviewed by applying LTC statutes and regulations to ensure consumer protections.	LTC riders are treated the same as any other LTC product.	No rates are not allowed to be changed on traditional life/annuity policies.	
Indiana	Indiana reviews the filing separately for life/annuity statutes and LTC statutes.	YES	LTC statutes/regs apply with some exceptions such as some disclosure forms and the inflation protection for acceleration is NA.	The life/annuity rates are reviewed by an actuary to confirming the nonforfeiture provision is met. LTC rates are also reviewed by the actuary.	
Iowa	Iowa reviews the filing as a single filing	The reviewer evaluates whether information in the LTC rider is adequately explained	Only some LTC provisions are reviewed	In Iowa, it depends on what the company files. The company's rate filing may or may not specifically address the LTC services. Additionally, rate filings may have variable rating. So, if the carrier increases the rate for LTC services or decreases the consumer crediting rate and does so within the approved variable rate, the company would not need to submit a rate filing to the Division	
Kansas	They are reviewed separately, as we have different reviewers for both	Yes	The content of LTC riders are reviewed in accordance with our Regulations,	Yes and yes in theory, as KS does not review nor file life/annuity rates.	

	life/annuity filings and Long Term Care.		except for rate stabilization, as we do not have jurisdiction over life/annuity rates.		
Kentucky	The LTC Rider is reviewed separately	Yes, we review the rider to ensure compliance with our LTC statutes and regulation, KRS 304.14-600 to 625 and sections that pertain withing 806 KAR 17:081.The purpose, among other purposes, of Kentucky Insurance Code KRS 304.14-600 to 625 is to protect the applicants for long-term care insurance from unfair or deceptive sales or enrollment practices, to establish standards for long term care insurance, and to facilitate public understanding of long-term care policies	LTC consumer protections apply to an LTC rider	Rates can be changed on a traditional life/annuity policy within the guaranteed maximum rate limits of the initial form filing. This approach would apply to riders	
Louisiana	Louisiana reviews the filing as a single filing using Life and Annuity statutes to review the product	Yes	They are treated the same as any other LTC product.	Louisiana does not review rates for life and annuity products.	

	and LTC statutes to review the rider.				
Maine	Review as a single filing	Maine statute 24-A MRSA Section 5072 Definitions: "Long-term care insurance policy" includes individual and group annuities and life insurance policies or riders that directly provide or that supplement coverage for long-term care insurance and a policy or rider that provides for payment of benefits based upon cognitive impairment or the loss of functional capacity. "Long-term care insurance policy" does not include: C. With regard to life insurance, an insurance policy or contract that accelerates the death benefit specifically for one or more of the qualifying events of terminal illness, medical conditions requiring extraordinary medical intervention or permanent institutional confinement and that provides the option of	Maine regulation Rule 425 similar provisions for riders except: The offer of inflation protection shall not be required of life insurance policies or riders containing accelerated long-term care benefits.	Yes, the rider rate would be reviewed for approval if changing	

		a lump sum payment for those benefits and does not condition the benefits or the eligibility for those benefits upon the receipt of long-term care.			
Maryland	A filing submitted for approval in Maryland may include either a life policy, an annuity contract and/or a number of riders including a LTC rider. If the LTC rider is a traditional rider providing LTC benefits independent of the Life/Annuity contract, we review it as a single filing. However, it never be a standalone rider benefit. Pursuant to the Entire contract clause, a rider is attached a made part of the Entire contract. If the LTC benefit rider provides for acceleration of benefits where the		Yes, we use a comprehensive checklist that is posted on our website for carriers to use. We require an outline of coverage and exempt LTC riders from NNFF requirements as well as inflation Guard protection that apply to LTC contracts. Here is a link to our checklist: chromeextension://efaidnbmnnnibpcajpcgiclfindmkaj/https://insurance.maryland.gov/Insurer/Documents/rates-and-forms/ltcinsinlifeins-anncontract03-31-10-web.pdf	No. Fees that are on file with the original filing and are outside the explanation of variables must be filed along with a revised actuarial memorandum. Rates for traditional LTC riders are reviewed and approved by our Actuaries. For Life/Annuity LTC riders, I do not recall ever receiving a request for rate increases.	

	trigger is either LTC, Chronic or terminal Illness, the rider is reviewed along with the life/annuity contract				
Massachusetts	MA requires the LTC rider to be withdrawn from the filing and submitted (along with its rates) in a separate LTC filing	When the rider is submitted as a LTC filing review is consistent with our standards. All LTC riders and their rates are subject to all LTC filing requirements	See previous answer	Rates are not required to be filed for life insurance or annuities but are required to be submitted for LTC	
Michigan	We would review the products together.	Yes. If the product is filed as, and meets the definition of, Long Term Care Insurance, any applicable requirement under the LTC Chapter of our Insurance Code would be required. Our LTC statutes contain certain exemptions for "life insurance policies or riders containing accelerated benefits for long-term care."	See prior response.	Life insurance rates are not filed.	
Minnesota	Minnesota typically reviews rider filings for previously approved Life products, rarely are the submitted	YES	We are currently developing a worksheet to assist with our review and document which statutes in	Not related to guarantees, only related to non-guaranteed elements Minnesota is developing policy in this area. A likely concept will be that LTC	

	together. We review the policy and rider separately. The life policy is reviewed using the appropriate Life checklist		our LTC statute apply	rider rates could not essentially increase through raising the rates unjustifiably on the life/annuity policy.	
Mississippi	The filing is reviewed as a single filing using Life and Annuity statutes to review the product and LTC statutes to review the rider.	Mississippi Insurance Regulations 19-3-8.1 to 19-3-8.13 protect the applicants for long-term care insurance from unfair or deceptive sales and as well as establishing standards for long term care insurance.	The LTC rider is treated the same as other LTC products. There are some requirements which do not apply to accelerated death benefits for long-term care; for example, Regulation 90-102.11 C. 1. does not require the offering of inflation protected benefits. There are also some additional requirements such as Section 19-3-8.6 H. which requires a monthly report be provided to the policy owner any time a long-term care benefit, funded through a life insurance vehicle by the acceleration of the	Current rates are not reviewed and can be changed on a traditional life/annuity policy within the guaranteed maximum rate limits of the initial form filing. This approach would apply to riders.	

			death benefit, is in benefit payment status.		
Missouri	They are submitted and reviewed as a single file	YES	This varies based on the product (annuity v. life v. LTC). For example, Individual deferred annuities require nonforfeiture, whereas life products that don't accumulate cash value do not require nonforfeiture.	Annuity rates are filed in MO, but life rates are not. Rates for LTC policies and riders can be changed. Rates can also be revised for annuity policies.	
Montana					
Nebraska	We allow companies to submit a single filing.	NO	N/A	Yes, as long as long the rates are still under the maximum in the original rate table. There is nothing in our law to prevent a change.	
Nevada	The products would be reviewed separately.	Yes, there is a review to see if the LTC component meets LTC consumer protections	Based on current regulations in NAC 687B, not all consumer protections are applicable to LTC riders.	Yes, but this is extremely rare. LTC riders would be "considered in play", but the use of LTC riders is very rare also	
New Hampshire	The products may be submitted in a single filing but are reviewed	The LTC rider must meet all LTC requirements.	They are treated as any other LTC product and	NH only reviews rates for life policies issued to discretionary groups.	These filings are extremely rare for NH.

	separately. If a LTC rider is submitted in the future to be added to a previously approved life/ann product, it may be submitted under either life TOI or LTC.		reviewed accordingly.	LTC rider rates are reviewed and approved separately, as are any rate adjustments.	
New Jersey	New Jersey reviews a Life/Annuity product and its LTC rider as a single filing unless a LTC rider filing is submitted separately with an indication of the line of business to which the LTC rider will be applied.	Yes, New Jersey's review includes an evaluation of whether the LTC Component meets LTC Consumer Protection requirements.	Yes, LTC riders are treated the same as any other LTC products	Yes, New Jersey allows rates to be changed on Life/Annuity policy, including the rider rates, provided that the changes fall within the range specified in the contract.	
New Mexico	New Mexico requires LTC riders to be submitted under the LTC TOI and Sub-TOI. The LTC rider is not expected to be submitted as a single filing	New Mexico reviews long-term care riders against our long-term care rule, 13.10.15 NMAC. Riders added to life insurance policies are exempted from some requirements. LTC riders do not always state that they are LTC riders, it may be hidden in the triggers for coverage. The LTC riders may	See previous response	New Mexico does not have authority to review life insurance rates but any changes to the LTC rider rates would need to be reviewed and approved	

		need to provide the associated filings with the filings so the underlying filings can be looked at.			
New York	The rider is reviewed separately.	Yes, riders must meet LTC consumer protections.	The riders are treated as any other LTC product.	Yes, though it depends on the type of policy. No, the LTC riders that have been approved are non-cancellable	
North Carolina	We would review the life/annuity product and LTC rider separately.	The LTC component would be subject to our statutes and codes that (mostly) follow Model Laws 640 and 641.	The riders are treated the same as a stand-alone LTC product meaning we would expect all requirements of a stand-alone policy to be applied to the rider unless exempt by the language like “This rule is not required of life insurance policies or riders containing accelerated long-term care benefits.” We would not expect an acceleration of benefits rider to be subject to certain requirements (i.e. non-forfeiture requirements or	For the most part, Life and Annuity products are non-cancellable and we would not allow a rate change on that portion of the policy. However, if the LTC rider was filed as guaranteed renewable, in theory, we would allow the company to increase rates if the request met rate-stabilization rules. To my knowledge, North Carolina has not had a rate increase request of this type.	

			inflation protection). Any extension of benefits rider, restoration of benefits rider, or a similar rider that provides long-term care benefits exceeding the death benefit must include benefit options and protections that are otherwise exempt in connection with accelerated benefits.		
North Dakota	ND reviews these as single filings of life/annuity in SERFF. The life/annuity policy governs the rider, the rider must still be compliant with ND code and administrative rules for LTC in order to be accepted	LTC riders are reviewed to ensure they meet similar requirements to standalone LTC products.	ND requires riders to meet the same standards as a standalone LTC policy. The base life/annuity policy dictates and governs the overall policy, but the overall rider must still meet the same standard as a standalone LTC product	ND does not allow rate changes on traditional life/annuity policies. We have not seen rate requests on riders, but would not allow them unless they are justified	

Ohio	Statutes and regulations that affect each line of insurance are considered in the review	The LTC rider is reviewed by applying LTC statutes and regulations to ensure consumer protections.	LTC riders are treated the same as any other LTC product.	Rates are not required to be filed for life insurance or annuities but are required to be submitted for LTC	
Oklahoma	There is no specific requirement as to how we review LTC Riders. If the LTC rider is filed with Life or Annuity forms (certificates, policy, forms) we will review the rider at the same time. Sometimes the LTC rider is filed months or years after the original forms were filed, we will review the LTC rider separately, but company will state when forms the rider will be offered with. The LTC rider will always be used or attached to a main Life/Annuity Product. We review it both ways.		Each rider is reviewed independently as there is no standardized format/wording for LTC riders. They are not treated the same as stand-alone LTC products. However, we never allow anything in the riders that is controversial and not favorable to the policyholders.	Rates/ act memorandums are filed with the initial filings. However, companies will file rate changes, updated statement of variability to meet regulatory changes. Riders are not considered in play.	

Oregon	Oregon reviews them together in one filing. Our Life forms reviewers utilize the same standards we use for overall LTC policies, resulting in equivalent consumer protection requirements	Most of the same provisions apply, with the requirements that only apply to fully LTC policies called out in our standards. Our LTC standards are attached in the Notes section in case any specific requirements would be helpful.	Oregon does not allow for rates to be changed on traditional life/annuity policies.		 Oregon LTC Standards.docx
Pennsylvania	Combined LTC and life products are reviewed in a single filing, but each component of the filing must meet the individual requirements associated with that product type.	The insurers are asked if there are any deviations from standard LTC consumer protections for a standalone offering and if differences exist, they are asked to explain.	See previous responses.	Rates are not allowed to be changed on traditional life/annuity policies.	
Puerto Rico	Puerto Rico reviews all forms in the filing within the same Serff file, but each form is evaluated separately using the regulations applicable to it.	LTC products are evaluated for compliance with the provisions of Chapter 66 of the Puerto Rico Health Insurance Code (26 L.P.R.A Sec 10251 – 10261), which includes consumer protections.	LTC riders are reviewed similarly to other LTC products. Regardless of whether it is a rider or a policy, the applicable regulations are the same as Chapter 66 of the Code, to the extent applicable.	In Puerto Rico, life insurance or annuity rates are not subject to review for prior approval under Article 12.020 of the Insurance Code.	

Rhode Island	It is reviewed as a single filing, but each coverage must comply with the statutes and regulations that apply to that coverage line.	Yes. The rider must comply with all LTC requirements.	They are treated the same. All LTC requirements must be met.	Life rates are not subject to filing in RI, but the LTC rates would still need to be filed and reviewed, even if contained in a Life rider.	It is reviewed as a single filing, but each coverage must comply with the statutes and regulations that apply to that coverage line.
South Carolina	Most of the time, we do look at the LTC riders separately. The only exception is if it is a true accelerated benefit where the company does not charge a premium for the rider. The exception is incredibly rare.	Yes, we review the products just as we do all other LTC products for compliance with SC law	We review the products just as we do all other LTC products with compliance with SC law. Our law does have some minor stipulations for LTC products that are riders on life policies, but all other provisions apply as it relates to the product being reviewed.	We haven't come across this. There are certain implications to changing rates- depending on why the rates are changed and who it applies to. Most of the LTC riders have been filed separately from the policy, which indicates that the rates could be filed to be changed. However, we have yet to see a carrier file for a rate change on an LTC rider product	
South Dakota	If the LTC riders are filed at the same time as the life/annuity forms, we would review as one filing. We would use the applicable rules/laws for the LTC rider and life/annuity forms.	Yes, we would use the applicable rules/laws for our review.	Yes, they would be treated as any other LTC product.	South Dakota does not review rates for life and annuity.	

Tennessee	When Tennessee receives a filing with both life or annuity products with an LTC rider reviews are completed as one single filing. Each line of business is reviewed for compliance with the applicable State rules, regulations and statutes.	Yes	Yes, the LTC rider is reviewed the same as any other LTC products for compliance with LTC consumer protections and State rules, regulations and statutes.	Rates are not required to be filed for life insurance or annuities. LTC rates are required.	
Texas	When Texas receives a life or annuity product with an LTC rider, the life or annuity product is reviewed separately from the LTC rider. The LTC rider is reviewed with the LTC rules prescribed in Chapter 3, Subchapter Y . There is an exception for some LTC riders that contain accelerated death benefits. An LTC accelerated death benefit rider would not be reviewed for LTC	For LTC riders used with life and annuity products, consumer protections are treated the same as other LTC products. For example, consumer disclosures, outline of coverage, mandated offers, etc. would apply.		For traditional whole life policies, carriers cannot change premium rates. For universal life policies, carriers cannot charge more than the maximum cost of insurance that was originally filed. For annuities, carriers cannot charge more than what was filed in the statement of variability. LTC riders meet the criteria referenced in the response from Question 1. If the LTC rider is issue-age in nature, carriers are allowed to change premium rates, but the changes must be filed with TDI for review and approval. TDI does not allow premium rate changes on attained-age LTC riders.	

	requirements if the rider/policy meets the following in 28 TAC §3.3804(b)(20): (i) that accelerate the death benefit specifically for one or more of the qualifying events of terminal illness, medical conditions requiring extraordinary medical intervention or permanent institutional confinement; and (ii) that provide the option of a lump-sum payment for those benefits; and (iii) where neither the benefits nor the eligibility for the benefits is conditioned upon the receipt of long-term care.				
Utah	A life or annuity product must be filed under the appropriate TOI in SERFF. The LTC	Any rider deemed to provide LTC benefits as defined by Utah Code § 31A-1-301(121) is subject to 31A-22-Part	Yes. All consumer protections apply: issue age rating, protection against unintentional	Utah does not regulate life insurance rates. Rates for life insurance can change to the extent that the life insurance contract allows it. Rates for the LTC riders must be filed with the	

	rider must be filed under LTC TOI in SERFF. Two separate filings are required.	14 (equivalent of the NAIC model 640) and Rule R590-148 (equivalent of the NAIC model 641). The rider is reviewed for compliance in the same way as any stand-alone LTC policy.	lapse, requirement to offer inflation protection, suitability, nonforfeiture benefits, and so on.	department, be guaranteed renewable, and can only be changed after being filed.	
Vermont	We have a small team. We have an actuarial consultant who assists in product review for life and annuities (individual) and also reviews LTC riders that may be attached. The standards may be separate depending on the product.	Yes, when there is a product that says Long-term care, we consider whether it should or should not be treated as LTC under the model regulation H-2009-01	In the model regulation, only certain parts apply to life riders that accelerate life benefits for long-term care. For instance, LTC riders on life are not required to provide inflation protection.	Life and Annuity products do not need prior approval for rates. However, LTC which is health insurance in VT, which is included in a life contract or ridered to a life contract could have a rate increase filed. Rates and supporting actuarial and company financial data must be filed with the department and approved before use.	
Virginia	Separately. The life/annuity product is subject to life/annuity requirements and the LTC rider is subject to health LTC (long-term care) requirements.	Section 38.2-5200 of the Code of VA and VA's LTC regulation (14 VAC 5-200-10 et seq.), which is very close to the NAIC model, incorporate LTC riders in the definition of LTC. As such, LTC riders are subject to requirements that apply to LTC with the few exceptions noted	See exceptions noted in previous column.	Life and annuity rates are not required to be filed in Virginia. As a health product, LTC riders are subject to rate review and approval.	

		below for life insurance policies and riders that accelerate LTC benefits. 14 VAC 5-200-100 C related to inflation protection, excepts life insurance policies and riders containing accelerated LTC benefits. 14 VAC 5-200-185 A related to nonforfeiture benefit requirements, excepts life insurance policies and riders containing accelerated LTC benefits. 14 VAC 5-200-175 related to suitability, excepts life insurance policies that accelerate benefits for LTC.			
Washington	The filing is submitted under either a Life TOI or an Annuity TOI. The LTC benefits are either embedded within the Policy/Certificate, or the LTC benefits are included as a Rider to the Life/Annuity product.	The filing must meet all statutory requirements for Life Insurance and the LTC benefit portion must meet all statutory requirements for LTC insurance (which include consumer protection requirements).	A LTC rider must meet all the statutory requirements for LTC in RCW 48.83 and WAC 284-83, except for WAC 284-83-210 through 284-83-245 do not apply to Life Insurance Policies that accelerate benefits	Yes, Washington allows rates to be changed for the LTC benefit of the form filing. Yes, an LTC embedded benefit or LTC rider attached to a Life or Annuity filing is effective when the filing receives final disposition of "Approved".	

	Washington does not review Life or Annuity rates. However, if the Life or Annuity filing includes LTC benefits (either embedded or as a Rider), an Actuarial Memorandum is required in the form filing. The Actuarial Memorandum must address the LTC loss ratios and demonstrate how reasonable the premiums are as compared to the benefits offered.		for long term care. WAC 284-83-250 specifies additional requirements that must be met for Acceleration of Benefits riders.		
West Virginia	We review as one product.	Not directly, but we review for consumer clarity	n/a	WV doesn't regulate rates on life products	
Wisconsin	The LTC rider must be filed separately under a LTC TOI. The rider is reviewed for compliance with s. Ins 3.46 Wis. Adm. Code.	LTC riders are reviewed to ensure they meet similar consumer protections to the stand alone LTC product.	LTC riders are treated the same as any other LTC product with the exception of nonforfeiture and inflation protection.	Rates are not required to be filed for life insurance or annuities.	

Wyoming	We review LTC rider separately	Yes – we review the same as a standalone LTC policy	We review the same as a standalone LTC policy	WY does not regulate rates for Life/Annuity policies, including riders	
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