

From: [Brady, Sean](#)
To: [King, Eric](#)
Cc: [Unger, Eric](#)
Subject: Re: Long-Term Care Actuarial (B) Working Group Exposure - Comments due July 10
Date: Monday, July 10, 2023 3:26:08 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Colorado's responses in **Bold**:

Please provide comments on the following:

The Minnesota and Texas approaches, as described in the Long-Term Care Insurance Multistate Rate Review Framework [MSA Framework Final Adopted 2022](#).

No comment.

The Utah Proposal for an Alternative Approach to LTCI Rate Increase Reviews [LTC Increase - Utah](#).

At this time, we do not have a complete response. We should have a response available by next Monday if that is acceptable.

Among the options for the form of comments being sought are:

A scorecard assessing the approaches' success in meeting key principles. These principles can be from the list provided on June 2, 2023 by ACLI / AHIP [Final ACLI-AHIP Comment Letter June 2, 2023](#), or as developed or thought of by the commenter.

Agree with ACLI that principles should be established for evaluation but the guidelines presented seem too generic to be useful in evaluating LTC approaches (MN, TX and the suggested Utah method).

Disagree with ACLI regarding differing analysis if filing is pre- or post-rate stability. The same method should be applied to pre- or post-rate stability filings. Propose that rate increases be determined on best estimate assumptions for both pre and post-rate stability.

Also disagree with principle #8: The approach should not apply subjective, arbitrary, or discretionary caps, factors, or limitations. At some point, limitations should exist especially if policyholders are 80+ and have had substantial past rate increases.

Assessment of the rate increase amounts resulting from the approaches, including for various types of situations, e.g., older and newer business, blocks with short or lengthy rate increase histories.

On Thu, Jun 8, 2023 at 4:53 PM King, Eric <EKing@naic.org> wrote:

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

Please provide comments on the following:

The Minnesota and Texas approaches, as described in the Long-Term Care Insurance Multistate Rate Review Framework [MSA Framework Final Adopted 2022](#).

The Utah Proposal for an Alternative Approach to LTCI Rate Increase Reviews [LTC Increase - Utah](#).

Among the options for the form of comments being sought are:

A scorecard assessing the approaches' success in meeting key principles. These principles can be from the list provided on June 2, 2023 by ACLI / AHIP [Final ACLI-AHIP Comment Letter June 2, 2023](#), or as developed or thought of by the commenter.

Assessment of the rate increase amounts resulting from the approaches, including for various types of situations, e.g., older and newer business, blocks with short or lengthy rate increase histories.

Comments should be submitted to [Eric King](#) by Monday, July 10.

Thanks,

Eric J. King, FSA, MAAA
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