

DATE: February 10, 2010
TO: IIPRC Management Committee
FROM: Industry Advisory Committee
SUBJECT: Proposed Standards For:

- **Individual Long Term Care Insurance Policy
(Dated 12/22/09)**

Pages 20-23, T. NONFORFEITURE BENEFITS

Item (1)

We suggested that you reinstate "or rider" since this is Model language and is more accurate since the benefit described could be added by rider.

We wish to confirm that the term "life insurance policy" would include a rider that was issued to the policy.

Page 24, W. PAYMENT OF CLAIM

Item (2)

We suggested that the item end with the word "disputes". The purpose of the IIPRC is to establish a uniform approach to Model requirements, and the Model changes recently adopted by (EX) at this last NAIC meeting should be the "standard" that the IIPRC relies on.

If you need to add "consistency" language, we suggest saying "consistent with the NAIC Model Regulation Section 31, entitled Appealing an Insurer's Determination that the Benefit Trigger Is Not Met.

Submitted by:

IIPRC Industry Advisory Committee:

Maureen Adolf, Prudential
Steve Buhr, AEGON
Tom English, New York Life
Michael Gerber, NAIFA
Mary Keim, State Farm Insurance Company
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