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To: [Comments <comments@insurancecompact.org>](#)
Cc: [Shepherd, Malinda](#); ["Miriam Krol"](#); ["John MacBain"](#); [Schutter, Karen](#)
Subject: LTC 5 Year Review: Proposed Amendments to HIPRC LTC Issue Age Rate Schedule Standards
Date: Tuesday, September 13, 2016 10:49:23 AM

Suggested Amendment

Since the Issue Age Scope section of the proposed amendments will state that "All dollar-for-dollar long-term care insurance rates are considered to be, for purposes of this Standard, Issue Age Rate Schedules", the definition of Issue Age Rate Schedules on page 2 of the standards should be similarly amended.

We think the definition on page 2 should be amended, as follows (red-line):

"Issue age rate schedules" are rate schedules where premiums are based on issue age and where premiums are not expected to change during the premium-paying period due to attained age or duration since issue or are rate schedules for Dollar-For-Dollar Long-Term Care Insurance. Single premium and limited pay plans (e.g., 20-pay policy) are allowed under this definition. The addition of increases in the benefit level that require additional premium, based on the issue age rate schedule applied at an insured's current age at the time of each increase in the benefit level, are allowed under this definition."

Sincerely on behalf of the Kentucky Department of Insurance.

Thank you,

Lorne

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