

March 18, 2026

Interstate Insurance Product Regulation Commission
1101 K Street, NW
Suite 650
Washington, DC 20001

RE: Colorado Department's request to amend the LTCI standards

Members of the Management Committee:

The American Council of Life Insurers (ACLI) appreciates this opportunity to comment on the Colorado Department's request for the Compact to amend its individual long-term care insurance (LTCI) standards to allow for states that require unisex LTCI rates. Respectfully, we ask that the Compact deny this request.

ACLI has been a strong and consistent advocate of the Compact since its formation. The Compact represents a true regulatory success story – demonstrating how states can work collaboratively to achieve greater uniformity, efficiency and speed to market, while maintaining strong consumer protections. Its success is due in no small part to the expertise and commitment of the Compact staff, whose work has been instrumental in building and maintaining a credible and effective system.

The mission of the Compact is to foster greater uniformity through its product standards and to provide a central clearinghouse for prompt review and regulatory approvals based on the Uniform Standards on behalf of the participating states. Colorado's request runs counter to this mission.

As we expressed to the Compact in 2022 when Colorado asked the Compact to amend the individual life insurance standards to permit suicide exclusion periods that are less than the Compact's two-year period, the continued allowance of state-specific deviations in the Uniform Standards risks diluting the effectiveness and long-term viability of the Compact. If such requests are granted, they threaten to undermine the very value proposition of the Compact – uniformity, predictability, and a single, reliable pathway for approvals.

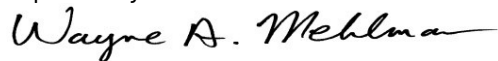
Granting Colorado's request could also encourage additional state-specific exceptions, further eroding consistency across jurisdictions and weakening the Compact's long-term viability. Preserving the integrity and authority of the Compact's Uniform Standards is essential to maintaining its role as a trusted and effective regulatory framework.

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For these reasons, we respectfully urge the Compact to not grant Colorado's request to amend the LTCI standards to address Colorado's unique unisex LTCI rate requirement. Instead, we would welcome the opportunity to work collaboratively with Colorado, the Compact and other interested parties to identify an alternative approach that addresses Colorado's objectives while preserving the Compact's mission of uniformity.

Thank you for your consideration. We appreciate the Committee's continued leadership and the important work of Compact staff, and we look forward to continued engagement on this issue. If you have any questions, please feel free to contact me.

Respectfully submitted,



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The American Council of Life Insurers is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 275 member companies represent 93 percent of industry assets in the United States.