

September 13, 2021

Interstate Insurance Product Regulation Commission
444 North Capitol Street, NW
Hall of the States Building
Suite 700
Washington, DC 20001

RE: Proposed Options to Maintain, Reduce or Eliminate the 15% Threshold for Compact Approval of In-Force Rate Increases on Individual Long-Term Care Insurance Products

Members of the Interstate Insurance Product Regulation Commission:

The American Council of Life Insurers (ACLI)¹ and the American Association of Health Insurance Plans (AHIP)² appreciate this opportunity to comment on the Compact's proposed Options to maintain, reduce or eliminate the existing 15% threshold for Compact approval of in-force rate increase requests on individual long-term care insurance products.

Since the establishment of the Compact, ACLI and AHIP and our member companies have been strong supporters of the Insurance Compact. The Compact allows for faster access to consumers of competitive insurance products, promotes uniformity among the states through the development and application of uniform product standards, and provides a central point of filing for insurers.

We believe there is significant value in the Compact Office performing the review and approval of in-force rate increase requests on Compact-approved individual long-term care insurance products and rate schedules. We also believe that the Commission should consider our members' continued reliance on the Compact Office's review and recommendations of rate increase requests of up to 15%.

Reducing or eliminating the 15% threshold for Compact approval authority of in-force rate increase requests under Options 2, 2(a) or 2(b) would unnecessarily increase the amount of time

¹ The American Council of Life Insurers (ACLI) 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 280 member companies represent 95 percent of industry assets in the United States.

² AHIP is the national association whose members provide health care coverage, services, and solutions to hundreds of millions of Americans every day. We are committed to market-based solutions and public-private partnerships that make health care better and coverage more affordable and accessible for everyone. Visit www.ahip.org to learn how working together, we are Guiding Greater Health.

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and resources it takes for states to approve actuarially-justified rate increases. It would also result in less uniformity among the states and potentially more rate differentials among policyholders. We, therefore, urge the Compact to maintain the existing 15% threshold and adopt Option 1.

Thank you for the opportunity to provide these comments. ACLI/AHIP welcome the opportunity to discuss our comments with you in the near future.

Sincerely,



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Senior Counsel, ACLI



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