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This letter, sent on behalf of the state of Kentucky Department of Insurance, is in response to the request for comments regarding the proposed standards for the dollar-for-dollar Long-Term Care ($for$ LTC) insurance benefit. Our comments pertain to the following revised standards as currently proposed:

a) Rate Filing Standards for Individual Long Term Care - Issue Age Rate Schedules Only  
b) Rate Filing Standards for Individual Long Term Care Modified Rate Schedules

We offer these comments for your consideration:

1. Within the ‘Scope’ section of the Issue Age Rate standard, perhaps after the second sentence, there should appear a clarifying sentence with respect to the Standard’s applicability to $4$ LTC, such as: ‘All dollar-for-dollar long-term care insurance rates are considered to be, for purposes of this standard, Issue Age Rate Schedules.’

2. The first sentence of Section 4.C.(4) of the Issue Age Rate standard should include the language ‘For other than dollar-for-dollar long-term care insurance, all . . .’. We suggest this because like subsection (2) and (3), requirement (4) should not apply to $4$ LTC; note that subsections (1) and (5) do apply to $4$ LTC.

3. The wording within the ‘Scope’ section of the Modified Rate standard should be enhanced so as to direct the reader to the Issue Age Rate standard for $4$ LTC requirements.

We are pleased with the action taken to revise these standards since we believe that the rates for $for$ LTC coverage will be more sustainable when they are subject to many of the same Actuarial Submission Requirements as the Standards that apply to the rates for other Long-Term Care insurance.

Sincerely,

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cc: Malinda A. Shepherd  
Kentucky Department of Insurance