### Legal, Compliance, & Regulatory



## Premium Rate Increases and Pricing Issues

Scott Kipper – Commissioner, Nevada Division of Insurance

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14th Annual Intercompany Long Term Care Insurance Conference

#### **Regulatory Evolution**



## Commissioner Scott Kipper Nevada Division of Insurance

#### **Regulatory Evolution**



- How We Got Here (Loss Ratio to Rate Stability)
- The Current NAIC Response
- What Needs to Be Addressed?
  - Balancing LTC Rating Issues with Supporting Market Growth
- The Future of the LTC Product and Regulation
  - Some Things Must Change
  - New Product Models
  - Future NAIC Model Considerations
- Observations as a Commissioner
  - Perspective from Nevada

#### **NAIC Efforts**



# Perry Kupferman California Insurance Department

#### A Detailed Look at NAIC Efforts



- The NAIC Health Actuarial Task Force
  - Work of the LTC Subgroups
  - Recommendations Being Advanced at Upcoming NAIC Meeting
  - Next Steps
- An Actuarial View of the Issues
- Margin and Reserve Considerations

#### **Company Perspective**



## Aaron Ball Genworth

#### **The Company Viewpoint**



- One Company's Approach to Existing Blocks and New Product Filings
- Observations on the Current State of Regulation
  - What is Needed Going Forward
- Approaches to Policyholder Options and Transparency

#### **Operational Considerations and Lessons**



## Guy Bertsch Unum



#### **Systems**

- Was your LTC system(s) built to handle rate increases?
- Are the blocks facing increases older, and also on older technology? Do you still have technical resources to make changes?
- Can you handle multiple increases?
- How do you handle variations by age, plan, or state?
- In addition to core functions like rating, policy issue and billing, do you have good tools for managing communications?
- Is your LTC on the same systems as other products? Is this good or bad?
- If you're still actively selling, do you build new products and systems with greater functionality?

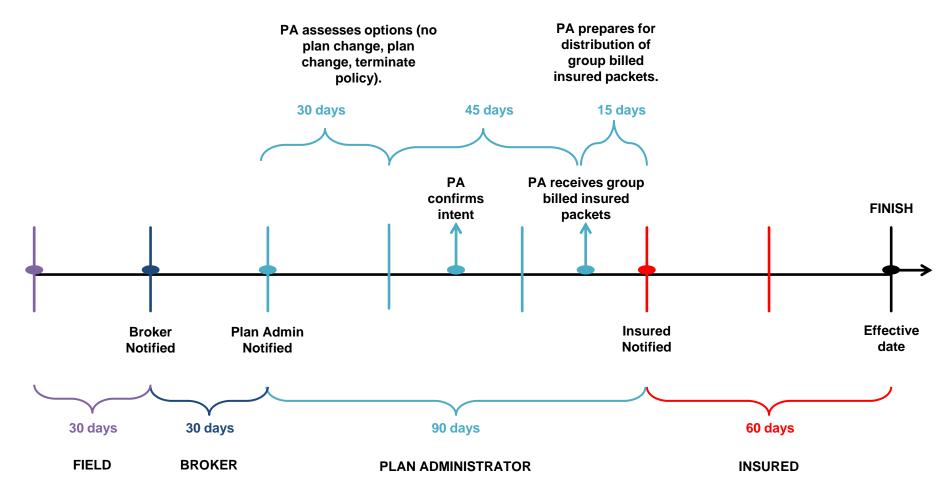


#### Communications

- Consider all partners HO/sales force, brokers/agents, plan admins (GLTC/Multi-life), Insureds
  - Build in adequate time for each
- Clearly explain the reasons, and comment on possible future increases
- Explain options and next steps plan changes, Contingent NF, timing, impact to bills
- Provide resources FAQs, websites, 800#, etc
  - Constantly refine these, even within a given project
  - Secure input from outside of LTC operation
  - Invest in training for frontline staff
- Prepare for state variations timing, size of approved increase, specific wording, comments about potential future increases



#### Sample GLTC Communication Timeline



(The communication campaign from start to finish is approximately 7 months.)



#### **Customer Reactions**

- Good, tough, fair questions minimal complaints
- Customers dealing directly with carrier, broker involvement shrinking carriers need to be ready
- Fairly strong persistency
- Minimal policy changes or Contingent NF election
- Recognize value of product, even post-increase
- Too early in GLTC Will employers abandon product? Will insureds react the same as ILTC?
- Future expectations proactively display plan alternatives and/or create new provisions



Q: Do Current NAIC Efforts Allow Companies to Address LTCI Rating Issues with Smaller, More Timely and Proactive Rate Actions?



Q: Is It Realistic to Assume a Product with a 30+ Year Tail Will Not Need Future Rate Adjustments?

Compare LTCI to Other Product Lines



Q: How Can We Promote Greater Speed to Market and Consistency Across States in New LTC Product Filings and Rate Actions?



Q: How Can We Promote Greater Speed to Market and Consistency Across States in New LTC Product Filings and Rate Actions?



Q: Are Current Products Adequately Serving the Middle Market? Do Regulations Need to Change to Accomplish This?



## Questions???