



July 26, 2016

Lisa Larson  
Assistant Deputy Director of Regulatory Affairs  
200 St. Paul Place  
Suite 2700  
Baltimore, Maryland 21202

**DELIVERY VIA Email**

Re: Maryland Insurance Administration [Bulletin 16-19](#) Proposing Amendments to Long-Term Care Insurance

Dear Ms. Larson:

On behalf of the American Council of Life Insurers (ACLI) and America's Health Insurance Plans (AHIP), we commend Maryland Insurance Administration (MIA) for proposing amendments to the Code of Maryland Regulations to adopt the *NAIC Long-Term Care Insurance Model Regulation* (NAIC Model).

We understand the goal of the amendments is to adopt the NAIC Model provisions in order to enact important consumer protections, including: defining a minimum composite margin for moderately adverse experience; requiring insurers to submit an annual actuarial certification regarding the sufficiency of the current premium rates; requiring insurers to replace loss ratio test rates with the greater of 58 percent and the original lifetime loss ratio with the adverse margin specified in the original filing; strengthening consumer disclosure requirements; and reducing contingent non-forfeiture triggers to make this benefit available to a broader range of policyholders.

We strongly support Maryland adopting the above mentioned NAIC Model provisions. However, we believe Maryland's current 15% annual rate cap on long-term care insurance premium increases is inconsistent with these provisions and would recommend that this cap be removed. We appreciate the opportunity to provide commentary and look forward to working with the MIA on the promulgation of the rule.

Sincerely,

Sincerely,

Rod Perkins  
ACLI

Amanda Matthiesen  
AHIP