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**Actuarial Memorandum  
Policy Forms (Certificates):**

**Previously filed under Life Investors Insurance Company of America (“LIICA”):  
GP001 796 (GC001-NH (MD) 796, GC001-LTC (MD) 796, GC001-HCC (MD) 796) As NEA Group  
Long Term Care Coverage**

**Applicable to All Policies (and Certificates as Applicable) Regardless of Application or Issue Date**

**1) Scope and Purpose**

This filing is a request for a premium rate increase of 108% on the above-captioned policy forms (and certificates as applicable) and all associated riders regardless of application or issue date. The increase for any given policy or certificate holder would not become effective until all statutory requirements are satisfied, and if applicable, a period of one year has elapsed since the effective date of the previously approved rate increase. Even though the traditional NAIC method of determining premium rate increases indicates that the Company could request an increase of 536.4%, the Company has chosen to base its increase request on the “Blended If-Knew/Make-up” justification formula, also known as, “The Minnesota Method.” The Minnesota Method is a hybrid of the traditional NAIC increase formula where the resulting justifiable increase is constrained to a lesser amount.

This premium rate increase is needed due to claim levels that produce lifetime loss ratios above the statutorily required minimum loss ratio. If the requested rate increase is approved and implemented as proposed, the company does not expect to request additional rate increases based on current expectations of future experience. However, if actual future experience were to deteriorate further, additional rate action may become necessary even if the requested rate increase is approved and implemented as proposed.

The purpose of this memorandum is to file revised premium rates in this state and demonstrate that the anticipated loss ratio meets the minimum requirements of this state. This memorandum is not to be used for other purposes.

**Benefit Reduction and Cost Sharing Option (with Rate Guarantee)**

The Company would also like to make available to all policyholders a Benefit Reduction and Cost Sharing option to help the customer avoid some or all of the cost of the premium rate increase and receive a premium rate guarantee for a set number of years as outlined in Appendix A. The Company is filing a Benefit Reduction and Cost Sharing Endorsement that will be issued to the policyholder if they choose this option.

The Benefit Reduction and Cost Sharing option affects both:

- 1) The policy/certificate benefit limits available under the policy/certificate (by reducing all of the policy benefit limits available by the Cost Sharing Percentage), and
- 2) Amounts that the policyholder/certificate holder and the Company are responsible for with respect to each claim (by reducing the amounts that the Company will pay for claims by the Cost Sharing Percentage). If inflation protection coverage is included in the policy/certificate, all future benefit amount increases will be based on the new revised benefit amounts. The Benefit Reduction and Cost Sharing option also applies to all policy/certificate benefit provisions, including any benefit provision added by rider or endorsement. The Benefit Reduction and Cost Sharing option also applies to benefits for covered care or services received by another covered person who is covered under the policy/certificate.

Benefit Reduction and Cost Sharing percentages were determined to be actuarially equivalent to the requested rate increase – which includes the cost of the Rate Guarantee. Policyholders and certificate holders selecting the Benefit Reduction and Cost Sharing option will generally be able to completely or partially offset the requested rate increase and receive the Rate Guarantee. Some policyholders or certificate holders electing the Benefit Reduction and Cost Sharing option may not be able to completely offset the requested rate increase but would be able to mitigate it. The Benefit Reduction and Cost Sharing percentages are shown in Appendix A.

Policyholders who elect the Benefit Reduction and Cost Sharing Option may still be subject to future rate increases after the Rate Guarantee period has expired if additional rate increases become justified due to further deterioration of experience not currently anticipated.

### **Buyback Offer**

This filing is also a request to allow the Company to offer policyholders the option to cancel their long-term care insurance policy in exchange for a one-time, lump-sum, policy cancellation payment in an amount to be determined based on the formula set forth below. The policyholder will be given the option to cancel their policy as an alternative to the premium increase.

The policy cancellation payment amount will be the greater of:

- x% of Transamerica's estimate of the value of the policy, and
- \$2,000

The Buyback will be offered to both premium paying policies as well as active paid-up policies that are not in Contingent Non-Forfeiture status.

More details about the buyback offer are displayed in Appendix B.

## **2) Benefits \***

### **NEA Group Series**

#### **A. Nursing Home**

Pays actual charges up to the Nursing Home Daily Benefit for each day benefits are payable. Benefits are payable up to the Maximum Nursing Home Lifetime Benefit.

#### **B. Home and Community Care - Certificate forms: GC001-HHC (MD) 796 & GC001-LTC (MD) 796**

Pays actual charges up to the Home and Community Care Maximum Daily Benefit. Benefits include Home Health, Adult Day Care, Respite Care, Equipment Purchases and Rentals, Assisted Living Facility, Bed Reservation, Ambulance, Hospice Facility, Home Hospice, Chore Services, and Emergency Response. Benefits are payable up to the Maximum Home and Community Care Lifetime Benefit.

#### **C. Simple Benefit Increase Option (BIO)**

Increases benefits by 5% of the original amount on each anniversary of the policy.

#### **D. Compound Benefit Increase Option (BIO)**

Increases benefits by 5% of the current amount on each certificate anniversary.

## **3) Renewability**

These contract forms are guaranteed renewable for life, subject to the company's right to change premium rates.

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\* This is not intended to be a comprehensive listing of all benefits available.

**4) Applicability**

This filing applies to inforce insureds only, as these forms are no longer actively being sold. The premium change will be applicable to the base forms and to all certificates and riders associated with the base forms.

**5) Morbidity**

Morbidity assumptions are developed using internal company experience looking across multiple variables. The assumptions for incidence, recovery, on-claim mortality, utilization, and transition generally vary on variables such as marital status, gender, implied elimination period, benefit period, benefit package, policy inflation option, issue age, attained age, issue year, and calendar year.

**6) Off-Claim Mortality**

Off-claim, or active life, mortality assumptions are developed using internal company experience and vary based on attained age, issue year, gender and marital status. The rates are further adjusted by improvement factors for the lessor of 35 years or the number of years to age 100 that vary by gender and attained age.

**7) Persistency**

Voluntary lapse rates are based on Company experience and vary by duration, issue age, marital status, service group, and policy inflation option.

**8) Expenses**

Expenses have not been explicitly projected. It is assumed the originally filed expense assumptions remain appropriate.

**9) Marketing**

These policy forms were marketed by agents to individuals in age ranges that vary by policy form.

**10) Policy Design**

Policy design features have been taken into consideration. Benefit provisions, exclusions, elimination periods, benefit periods, number of units, benefit growth, etc. have been accounted for either in the development of claim costs or projection model formulas.

**11) Underwriting**

These policy forms were fully underwritten with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interview and/or face-to-face assessment.

**12) Claims Adjudication Practice**

No significant changes to the standard operating practices of the Claims Department have been necessary to date nor are any changes expected to be necessary in the future. The claims adjudication staff has maintained a consistently high degree of expertise, experience, and performance over the life of these policy forms and this is expected to continue in the future. Therefore, special adjustments due to claims adjudication practice have not been incorporated into the projection.

**13) Premiums**

Premiums vary based on original issue age, rate class, and benefit options selected.

**14) Issue Age Range**

For the NEA Group Series, applicants age 18–79 were eligible for all elimination periods and benefit periods. Applicants age 80–84 were eligible for the 100-day elimination period and the 1-year, 2-year, 3-year and 4-year benefit periods only. Applicants age 85 and older were eligible for the 100-day elimination period and the 1-year and 2-year benefit periods only.

**15) Area Factors**

Area factors are not used for these products.

**16) Average Annual Premium**

| <b>Series</b>    | <b>Before Increase</b> | <b>After Increase</b> |
|------------------|------------------------|-----------------------|
| <b>NEA Group</b> | \$2,931                | \$6,097               |

**17) Premium Modalization Rules**

Modal factors, which are applied to the annual premium, are no greater than the following:

| <b>Premium Mode</b>     | <b>Annual</b> | <b>Semi-annual</b> | <b>Quarterly</b> | <b>Monthly</b> |
|-------------------------|---------------|--------------------|------------------|----------------|
| <b>NEA Group Series</b> | 1.000         | 0.500              | 0.250            | 0.083          |

**18) Claim Liability and Reserve**

The present value of amounts not yet due (Exhibit 6) is calculated for all open claims using termination rates derived from company experience. The resulting reserve is adjusted by factors based on age at incurral, sex, and benefit period developed from company experience. The interest rate varies by year of incurral. The incurred but not reported and in course of settlement reserves (Exhibit 8) are calculated based on the development of incurred claims by month of incurral, based on internal Company data. The claim reserves underlying the incurred claims in the projection are consistent with the reserves reported in Exhibits 6 and 8 of the Company's financial statement.

**19) Active Life Reserve**

Active life reserves may have been used in the original pricing of the captioned forms to demonstrate compliance with the minimum 60% loss ratio. However, active life reserves have not been used in this premium rate increase filing to demonstrate compliance with the 60% loss ratio requirement. As a result, we are requesting a lesser increase than would have been necessary had we included the cost of the active life reserves.

**20) Trend Assumptions**

As this is not medical insurance, we have not included any explicit medical cost trends in the projections.

**21) Minimum Required Loss Ratio**

The Statutorily Required Minimum Loss Ratio for these forms is 60%.

**22) Anticipated Loss Ratio**

The anticipated lifetime loss ratio for this block of business is shown in Exhibit I.

**23) Distribution of Business**

See Attachment A.

**24) Contingency and Risk Margins**

Contingency and risk margins have not been included in the justification for this rate increase.

**25) Experience on the Form**

See Exhibit I for nationwide calendar year historical experience through September 30, 2022, as well as projected experience thereafter both with and without the proposed rate increase. See Exhibit II for nationwide policy year actual-to-expected experience where 'actual' experience includes historical experience through September 30, 2022, combined with current-assumption projected experience thereafter. Nationwide earned premium has been adjusted to reflect the timing and magnitude of approved rate increase history of this state. Historical incurred claims in all exhibits reflect claim payment runoff through December 31, 2022, plus the claim reserve estimate as of December 31, 2022 (as described in Section 16 above).

**26) History of Rate Adjustments**

The magnitude of rate increases approved for each product discussed herein is displayed in Attachment B.

**27) Number of Insureds**

As of December 31, 2022, the number of insureds that will be affected by this increase is:

|                        | Insureds | Annualized Premium |
|------------------------|----------|--------------------|
| Maryland:              |          |                    |
| Subject to Increase    | 394      | \$1,159,129        |
| Buyback Only (Paid Up) | 1        |                    |
| Nationwide:            |          |                    |
| Subject to Increase    | 6,294    | \$18,449,813       |
| Buyback Only (Paid Up) | 1,138    |                    |

**28) Proposed Effective Date**

The proposed rate increase will be implemented following approval, after fulfillment of all statutory and contractual requirements. The increase for any insured will not become effective until a period of one year has elapsed since the previously approved rate increase effective date, if applicable.

**29) Actuarial Certification**

I certify that to the best of my knowledge and judgment, the entire rate filing is in compliance with the applicable laws of this state and with the rules of the Department of Insurance, and complies with all applicable Actuarial Standards of Practice including Actuarial Standard of Practice No 8. I certify that benefits are reasonable in relation to premium at the requested rate schedule. If the requested increase is implemented and the underlying assumptions are realized, no further premium rate schedule increases are anticipated. However, going forward, the Company will continue to monitor the experience of this block and reserves the right to take additional rate action if currently unanticipated future deterioration thereof justifies.



Brad Rokosh, ASA, MAAA  
Head of Financial Assets Product Management

January 16, 2024

Attachment A

Transamerica Life Insurance Company

Distribution of Business

By Issue Age

|          |       |
|----------|-------|
|          |       |
| 0 to 59  | 76.8% |
| 60 to 64 | 16.3% |
| 65 to 69 | 5.7%  |
| 70 to 74 | 1.1%  |
| 75 to 79 | 0.1%  |
| 80 to 84 | 0.0%  |
| 85 +     | 0.0%  |

By Elimination Period

| 0 day | 20 day | 30 day | 60 day | 90 day | > 90 days |
|-------|--------|--------|--------|--------|-----------|
| 9.4%  | 11.6%  | 0%     | 49.9%  | 29.1%  | 0%        |

By Maximum Benefit Option

| ≤2 Yr | 3 Yr | 4 Yr  | ≥5 Yr* | Unlimited |
|-------|------|-------|--------|-----------|
| 3.0%  | 8.5% | 25.0% | 0%     | 63.5%     |

\* Not including Unlimited.

Attachment B

Transamerica Life Insurance Company

Rate Increase History

| Policy Form                     | First Increase<br>(Approved) | Second<br>Increase<br>(Approved) | Third Increase<br>(Approved) | Fourth Increase<br>(Approved) | Fifth Increase<br>(Approved) | Sixth Increase<br>(Approved) | Seventh<br>Increase<br>(Approved) | Eighth<br>Increase*<br>(Approved) | Ninth Increase*<br>(Approved) |
|---------------------------------|------------------------------|----------------------------------|------------------------------|-------------------------------|------------------------------|------------------------------|-----------------------------------|-----------------------------------|-------------------------------|
| NEA Group<br>(BP < 4 years)     | 20%<br>(2005)                | 20%<br>(2006)                    |                              |                               |                              | 15%<br>(2013)                | 15%<br>(2017)                     | 10%<br>(2021)                     | 10%<br>(2021)                 |
| NEA Group<br>(4 ≤ BP < 6 years) | 20%<br>(2005)                | 20%<br>(2006)                    | 20%<br>(2008)                |                               |                              | 15%<br>(2013)                | 15%<br>(2017)                     | 10%<br>(2021)                     | 10%<br>(2021)                 |
| NEA Group<br>(BP ≥ 6 years)     | 20%<br>(2005)                | 20%<br>(2006)                    | 20%<br>(2008)                | 20%<br>(2009)                 | 14%<br>(2011)                | 15%<br>(2013)                | 15%<br>(2017)                     | 12.5%<br>(2021)                   | 12.5%<br>(2021)               |

\*Applies only to policies/certificates with a Benefit Increase Option and Issue Age ≤69.



# Appendix A

## Benefit Reduction and Cost Sharing Option (with Rate Guarantee)

The Benefit Reduction and Cost Sharing Endorsement (the "Endorsement") consists of three components:

1. Reduction to all policy or certificate benefit amounts, including but not limited to the Maximum Daily Benefit, Maximum Monthly Benefit and the policy or certificate Maximum Amount

All policy or certificate benefit amounts (including, but not limited to, all Maximum Daily/Monthly Benefit amounts and the policy or certificate Maximum Amount) in effect immediately prior to the Endorsement effective date will be reduced by an amount equal to the Cost Sharing Percentage as shown below.

For example:

If the policy or certificate Maximum Amount is \$100,000 and the Cost Sharing Percentage is 20%, the policy/certificate Maximum Amount will be reduced to \$80,000. The Company will not be responsible for any costs that exceed the reduced policy/certificate Maximum Amount.

If the Maximum Daily Benefit amount is \$100, and the Cost Sharing Percentage is 20%, the Maximum Daily Benefit amount will be reduced to \$80. The Company will not be responsible for any daily costs that exceed the reduced Maximum Daily Benefit.

The dollar amount and percentages used in these examples may be different from the actual dollar amounts and percentages that apply to the policy/certificate.

2. Application of Cost Sharing to Claim Payments

As long as all policy/certificate provisions and conditions are satisfied, for any benefit for which a claim is made under the policy/certificate, the Company will pay its Cost Sharing Percentage of such benefit, but the Company will pay no more than the applicable Maximum Daily/Monthly Benefit amounts as shown on the Endorsement. The policyholder/certificate holder will be responsible for paying the remaining portion of the applicable long term care expenses associated with such claim. Note that only amounts paid by the Company will be deducted from the revised policy/certificate Maximum Amount.

For example: If the revised Maximum Daily Benefit for a covered Long Term Care Facility is \$80 and the Company's Cost Sharing Percentage is 80%, the Company will pay 80% of the Long Term Care Facility charges, but no more than \$80. Using the same formula:

- If the Long Term Care Facility charges are \$80, the Company will pay \$64 and the policyholder/certificate holder will be responsible for \$16.
- If the Long Term Care Facility charges are \$100, the Company will pay \$80 and the policyholder/certificate holder will be responsible for \$20.
- If the Long Term Care Facility charges are \$200, the Company will pay \$80 and the policyholder/certificate holder will be responsible for \$120.

3. Rate Guarantee

Premium rates for the policy will be guaranteed from the effective date of the Endorsement for 10 years. The policy will be excluded from any future increases until after the Rate Guarantee has expired. Any benefits added to the policy after the effective date of the Endorsement will not be covered by the Rate Guarantee.

See "Appendix A: Cost Sharing Percentages Table" for the Benefit Reduction and Cost Sharing Agreement Percentages by Company (or Former Company), Benefit Increase Option, and Benefit Period.

**Appendix A - Cost Sharing Percentages Table**

| <b>Company<br/>(or Former<br/>Company*)</b> | <b>Benefit Increase<br/>Option</b> | <b>Benefit Period</b> | <b>Cost Sharing%</b> | <b>Required<br/>Remaining<br/>RINC</b> |
|---|------------------------------------|-----------------------|----------------------|--|
| LIICA                                       | Compound                           | 2-year                | 30%                  |  |
|   | Compound                           | 4-year                | 30%                  |  |
|   | Compound                           | Lifetime              | 30%                  | 26.0%                                  |
|   | No Bio                             | 2-year                | 30%                  | 59.7%                                  |
|   | No Bio                             | 4-year                | 30%                  | 59.5%                                  |
|   | No Bio                             | Lifetime              | 30%                  | 78.5%                                  |
|   | Simple                             | 2-year                | 30%                  | 31.6%                                  |
|   | Simple                             | 4-year                | 30%                  | 31.3%                                  |
|   | Simple                             | Lifetime              | 30%                  | 57.4%                                  |

\*For Company (or Former Company), please refer to the cover letter for the complete mapping of policy forms.

## Appendix B

In conjunction with the pending rate increase filing, Transamerica would like to offer policyholders the option to cancel their long-term care insurance policy in exchange for a one-time, lump-sum, policy cancellation payment in an amount to be determined based on the formula set forth below. The policyholder will be given the option to cancel their policy as an alternative to the premium increase. The idea behind the policy cancellation is to provide policyholders with an additional choice, which is different from the range of benefit reduction options that is routinely offered in connection with premium increases. All of the available options – including the policy cancellation offer and benefit reduction options – will be explained more fully in the rate increase notification package. Any policyholder who expresses interest in the policy cancellation offer will also receive a policy cancellation agreement (included with this filing) that the policyholder will be required to sign and return before the policy is cancelled and the policy cancellation payment is issued to the policyholder.

The policyholder will be advised that they do not have to cancel their policy and that they should carefully consider whether or not it is the right option for them. The policyholder will be advised that if they choose to cancel their policy, it will terminate and they will not be able to reinstate it under any circumstances. Once the policyholder completes the policy cancellation there will never be any benefits available – including, for example, any return of premium benefit. We will strongly encourage the policyholder to consult with their family members and tax, legal and financial advisors before making the decision on whether or not to cancel their policy.

The policy cancellation payment amount will be the greater of:

- X% of Transamerica's estimate of the value of the policy, and
- \$2,000

Transamerica's estimate of the value ("Value") of the policy is based on the present value of the best estimate cash flows (benefits and expenses less future premiums). Our estimate of the Value of the policy is only an estimate – the actual benefit payments a policyholder could receive if they choose to keep their policy in force and later become eligible for benefits under the policy may be higher or lower than our estimate. Our estimate of the Value of each policy will vary depending on numerous characteristics, including issue age, issue date, gender, marital status at the time of issue, policy benefit characteristics and other factors. Our estimate of the Value of one policy will likely be different from our estimate of the Value of other policies, even between spouses who have paid similar premium amounts. Because the Company's estimate of the policy's Value is consistent with how the Company calculates reserves and is intended to capture all significant differences in experience across many variables, we believe that this formula does not unfairly discriminate between policyholders, but we ask the Department of Insurance to formally approve the policy cancellation payment calculation method. The same methodology will be used to calculate the Value for each policyholder subject to this rate increase filing, including policyholders that may currently be on claim. The same methodology and the same fixed percentage of the policy's Value will be used to calculate the policy cancellation payment that is being offered to every policyholder in the state.

The policyholder will be told that we cannot provide advice regarding the tax consequences associated with cancelling their policy. The tax treatment of each individual's policy cancellation payment could be affected by whether the policyholder previously deducted or excluded premiums from their taxable income or whether the policyholder's premiums were paid by their employer. We will advise the policyholder that before choosing the policy cancellation option, they should consult with their own personal tax advisor regarding the tax treatment of the transaction, including the tax treatment of the policy cancellation payment that would be made if they cancel their policy. The policyholder will also be advised that we may send to the Internal Revenue Service and the policyholder an IRS Form 1099 reporting taxable income with respect to the policy cancellation payment. In some circumstances the amount of taxable income the policyholder realizes from the policy cancellation payment could exceed the amount that we report on IRS Form 1099.

**Exhibit I**  
**Transamerica Life Insurance Company**  
**NEA Group**

**Nationwide Experience Adjusted to Maryland-Specific Rate History**  
**All Policyholders Pay the Requested Increase**

| Year        | Earned Premium  |  | Incurred Claims                | Loss Ratios Excluding Change in ALR |                         |  |                                       |
|-------------|---|--|--------------------------------|-------------------------------------|-------------------------|--|---------------------------------------|
|             | Actual Past & Projected Future w/o Proposed Rate Increase | Actual Past & Projected Future w/ Proposed Rate Increase | Actual Past & Projected Future | Actual w/o Rate Increase            | Actual w/ Rate Increase | PV Actual Cumulative w/o Rate Increase | PV Actual Cumulative w/ Rate Increase |
| 1991-1992   | 7,212   | 7,212  | 0                              | 0.0%                                | 0.0%                    | 0.0%                                   | 0.0%                                  |
| 1993        | 7,634   | 7,634  | 0                              | 0.0%                                | 0.0%                    | 0.0%                                   | 0.0%                                  |
| 1994        | 14,605  | 14,605   | 0                              | 0.0%                                | 0.0%                    | 0.0%                                   | 0.0%                                  |
| 1995        | 60,316  | 60,316   | 0                              | 0.0%                                | 0.0%                    | 0.0%                                   | 0.0%                                  |
| 1996        | 151,263   | 151,263  | 0                              | 0.0%                                | 0.0%                    | 0.0%                                   | 0.0%                                  |
| 1997        | 878,910   | 878,910  | 0                              | 0.0%                                | 0.0%                    | 0.0%                                   | 0.0%                                  |
| 1998        | 2,628,150   | 2,628,150  | 10,359                         | 0.4%                                | 0.4%                    | 0.3%                                   | 0.3%                                  |
| 1999        | 4,940,864   | 4,940,864  | 695,687                        | 14.1%                               | 14.1%                   | 7.9%                                   | 7.9%                                  |
| 2000        | 7,450,499   | 7,450,499  | 778,084                        | 10.4%                               | 10.4%                   | 9.0%                                   | 9.0%                                  |
| 2001        | 9,747,893   | 9,747,893  | 755,681                        | 7.8%                                | 7.8%                    | 8.6%                                   | 8.6%                                  |
| 2002        | 11,920,964  | 11,920,964   | 1,576,771                      | 13.2%                               | 13.2%                   | 9.9%                                   | 9.9%                                  |
| 2003        | 13,253,449  | 13,253,449   | 1,921,827                      | 14.5%                               | 14.5%                   | 11.0%                                  | 11.0%                                 |
| 2004        | 12,996,720  | 12,996,720   | 2,628,359                      | 20.2%                               | 20.2%                   | 12.7%                                  | 12.7%                                 |
| 2005        | 12,979,674  | 12,979,674   | 3,635,838                      | 28.0%                               | 28.0%                   | 15.0%                                  | 15.0%                                 |
| 2006        | 14,896,877  | 14,896,877   | 3,167,261                      | 21.3%                               | 21.3%                   | 15.9%                                  | 15.9%                                 |
| 2007        | 16,912,507  | 16,912,507   | 4,136,231                      | 24.5%                               | 24.5%                   | 17.0%                                  | 17.0%                                 |
| 2008        | 16,907,713  | 16,907,713   | 4,273,751                      | 25.3%                               | 25.3%                   | 17.9%                                  | 17.9%                                 |
| 2009        | 18,705,579  | 18,705,579   | 5,037,429                      | 26.9%                               | 26.9%                   | 18.9%                                  | 18.9%                                 |
| 2010        | 20,007,735  | 20,007,735   | 6,615,568                      | 33.1%                               | 33.1%                   | 20.3%                                  | 20.3%                                 |
| 2011        | 19,986,566  | 19,986,566   | 5,820,754                      | 29.1%                               | 29.1%                   | 21.0%                                  | 21.0%                                 |
| 2012        | 20,739,762  | 20,739,762   | 6,685,940                      | 32.2%                               | 32.2%                   | 21.9%                                  | 21.9%                                 |
| 2013        | 20,208,520  | 20,208,520   | 12,283,101                     | 60.8%                               | 60.8%                   | 24.6%                                  | 24.6%                                 |
| 2014        | 21,996,388  | 21,996,388   | 11,419,870                     | 51.9%                               | 51.9%                   | 26.4%                                  | 26.4%                                 |
| 2015        | 21,282,889  | 21,282,889   | 14,148,735                     | 66.5%                               | 66.5%                   | 28.7%                                  | 28.7%                                 |
| 2016        | 20,417,982  | 20,417,982   | 13,223,561                     | 64.8%                               | 64.8%                   | 30.5%                                  | 30.5%                                 |
| 2017        | 19,401,296  | 19,401,296   | 12,892,723                     | 66.5%                               | 66.5%                   | 32.1%                                  | 32.1%                                 |
| 2018        | 19,931,683  | 19,931,683   | 13,587,470                     | 68.2%                               | 68.2%                   | 33.6%                                  | 33.6%                                 |
| 2019        | 20,349,736  | 20,349,736   | 16,019,759                     | 78.7%                               | 78.7%                   | 35.3%                                  | 35.3%                                 |
| 2020        | 18,909,603  | 18,909,603   | 10,748,730                     | 56.8%                               | 56.8%                   | 36.1%                                  | 36.1%                                 |
| 2021        | 18,642,804  | 18,642,804   | 22,034,034                     | 118.2%                              | 118.2%                  | 38.6%                                  | 38.6%                                 |
| 2022Q123    | 14,649,469  | 14,649,469   | 16,847,872                     | 115.0%                              | 115.0%                  | 40.3%                                  | 40.3%                                 |
| 2022Q4      | 4,725,945   | 4,725,945  | 6,336,697                      | 134.1%                              | 134.1%                  | 41.0%                                  | 41.0%                                 |
| 2023        | 19,495,530  | 19,495,530   | 26,675,432                     | 136.8%                              | 136.8%                  | 43.6%                                  | 43.6%                                 |
| 2024        | 18,276,910  | 18,276,910   | 29,008,618                     | 158.7%                              | 158.7%                  | 46.4%                                  | 46.4%                                 |
| 2025        | 17,045,242  | 30,424,854   | 31,382,513                     | 184.1%                              | 103.1%                  | 49.3%                                  | 48.5%                                 |
| 2026        | 15,827,736  | 32,906,653   | 33,780,005                     | 213.4%                              | 102.7%                  | 52.3%                                  | 50.5%                                 |
| 2027        | 14,629,440  | 30,429,234   | 36,096,104                     | 246.7%                              | 118.6%                  | 55.4%                                  | 52.7%                                 |
| 2028        | 13,454,978  | 27,986,354   | 38,276,524                     | 284.5%                              | 136.8%                  | 58.6%                                  | 54.9%                                 |
| 2029        | 12,309,553  | 25,603,870   | 40,189,132                     | 326.5%                              | 157.0%                  | 61.8%                                  | 57.3%                                 |
| 2030        | 11,197,936  | 23,291,707   | 41,878,353                     | 374.0%                              | 179.8%                  | 65.1%                                  | 59.7%                                 |
| 2031        | 10,125,439  | 21,060,914   | 43,291,959                     | 427.6%                              | 205.6%                  | 68.3%                                  | 62.2%                                 |
| 2032        | 9,096,976   | 18,921,710   | 44,277,811                     | 486.7%                              | 234.0%                  | 71.5%                                  | 64.6%                                 |
| 2033        | 8,116,296   | 16,881,896   | 44,778,220                     | 551.7%                              | 265.2%                  | 74.5%                                  | 67.0%                                 |
| 2034        | 7,187,851   | 14,950,730   | 44,818,193                     | 623.5%                              | 299.8%                  | 77.5%                                  | 69.4%                                 |
| 2035        | 6,316,372   | 13,138,053   | 44,398,288                     | 702.9%                              | 337.9%                  | 80.4%                                  | 71.6%                                 |
| 2036        | 5,506,237   | 11,452,973   | 43,545,484                     | 790.8%                              | 380.2%                  | 83.0%                                  | 73.8%                                 |
| 2037        | 4,760,696   | 9,902,247  | 42,160,252                     | 885.6%                              | 425.8%                  | 85.5%                                  | 75.8%                                 |
| 2038        | 4,081,111   | 8,488,710  | 40,269,644                     | 986.7%                              | 474.4%                  | 87.8%                                  | 77.7%                                 |
| 2039        | 3,468,331   | 7,214,128  | 37,993,608                     | 1095.4%                             | 526.7%                  | 89.9%                                  | 79.4%                                 |
| 2040        | 2,922,423   | 6,078,639  | 35,387,867                     | 1210.9%                             | 582.2%                  | 91.8%                                  | 80.9%                                 |
| 2041        | 2,442,141   | 5,079,653  | 32,543,271                     | 1332.6%                             | 640.7%                  | 93.4%                                  | 82.3%                                 |
| 2042        | 2,024,741   | 4,211,462  | 29,502,633                     | 1457.1%                             | 700.5%                  | 94.8%                                  | 83.5%                                 |
| 2043        | 1,666,027   | 3,465,336  | 26,376,305                     | 1583.2%                             | 761.1%                  | 96.1%                                  | 84.5%                                 |
| 2044        | 1,361,198   | 2,831,291  | 23,327,817                     | 1713.8%                             | 823.9%                  | 97.1%                                  | 85.4%                                 |
| 2045        | 1,104,910   | 2,298,214  | 20,400,173                     | 1846.3%                             | 887.7%                  | 98.0%                                  | 86.1%                                 |
| 2046        | 891,677   | 1,854,688  | 17,652,434                     | 1979.7%                             | 951.8%                  | 98.7%                                  | 86.7%                                 |
| 2047        | 715,813   | 1,488,891  | 15,092,643                     | 2108.5%                             | 1013.7%                 | 99.3%                                  | 87.2%                                 |
| 2048        | 571,840   | 1,189,426  | 12,788,164                     | 2236.3%                             | 1075.2%                 | 99.8%                                  | 87.6%                                 |
| 2049        | 454,843   | 946,074  | 10,770,921                     | 2368.1%                             | 1138.5%                 | 100.2%                                 | 88.0%                                 |
| 2050        | 360,425   | 749,684  | 9,019,049                      | 2502.3%                             | 1203.0%                 | 100.5%                                 | 88.2%                                 |
| 2051        | 284,750   | 592,281  | 7,505,442                      | 2635.8%                             | 1267.2%                 | 100.8%                                 | 88.4%                                 |
| 2052        | 224,458   | 466,874  | 6,200,376                      | 2762.4%                             | 1328.1%                 | 101.0%                                 | 88.6%                                 |
| 2053        | 176,690   | 367,516  | 5,101,925                      | 2887.5%                             | 1388.2%                 | 101.1%                                 | 88.7%                                 |
| 2054        | 139,033   | 289,189  | 4,192,347                      | 3015.4%                             | 1449.7%                 | 101.3%                                 | 88.8%                                 |
| 2055        | 109,471   | 227,700  | 3,444,130                      | 3146.2%                             | 1512.6%                 | 101.4%                                 | 88.9%                                 |
| 2056        | 86,358  | 179,624  | 2,838,790                      | 3287.2%                             | 1580.4%                 | 101.4%                                 | 89.0%                                 |
| 2057        | 68,321  | 142,108  | 2,341,698                      | 3427.5%                             | 1647.8%                 | 101.5%                                 | 89.0%                                 |
| 2058        | 54,251  | 112,842  | 1,948,628                      | 3591.9%                             | 1726.9%                 | 101.5%                                 | 89.1%                                 |
| 2059        | 43,263  | 89,986   | 1,633,102                      | 3774.9%                             | 1814.8%                 | 101.6%                                 | 89.1%                                 |
| 2060        | 34,654  | 72,080   | 1,376,961                      | 3973.5%                             | 1910.3%                 | 101.6%                                 | 89.1%                                 |
| 2061        | 27,879  | 57,988   | 1,178,172                      | 4226.0%                             | 2031.8%                 | 101.6%                                 | 89.2%                                 |
| 2062        | 22,506  | 46,812   | 1,010,872                      | 4491.6%                             | 2159.4%                 | 101.7%                                 | 89.2%                                 |
| 2063        | 18,210  | 37,876   | 873,383                        | 4796.2%                             | 2305.9%                 | 101.7%                                 | 89.2%                                 |
| 2064        | 14,746  | 30,671   | 755,630                        | 5124.4%                             | 2463.7%                 | 101.7%                                 | 89.2%                                 |
| PV Past     | 159,684,663   | 159,684,663  | 64,363,000                     | 40.3%                               | 40.3%                   |  |                                       |
| PV Future   | 36,180,865  | 63,581,846   | 134,812,573                    | 372.6%                              | 212.0%                  |  |                                       |
| PV Lifetime | 195,865,528   | 223,266,508  | 199,175,573                    | 101.7%                              | 89.2%                   |  |                                       |

**Exhibit II  
Transamerica Life Insurance Company**

**NEA Group**

**Nationwide Experience Adjusted to Maryland-Specific Rate History**

**Actual To Expected Lifetime Experience**

**Actual Nationwide Experience Through 9/30/2022 and Projected Thereafter**

| Duration    | Actual                               |   |  |  | Expected                             |  |  | Actual to Expected                |   |  |
|-------------|--------------------------------------|---|--|--|--------------------------------------|--|--|-----------------------------------|---|--|
|             | A                                    | B   | C                                      | D  | E                                    | F                                      | G  | H=A/E                             | I=C/F   | J=D/G  |
|             | Earned Premium @ Original Rate Level | Earned Premium Adjusted To Approved Maryland Rate History | Incurred Claims Excluding ALR Increase | Cumulative Loss Ratio Excluding ALR Increase | Earned Premium @ Original Rate Level | Incurred Claims Excluding ALR Increase | Cumulative Loss Ratio Excluding ALR Increase | Actual to Expected Earned Premium | Actual to Expected Incurred Claims Excluding ALR Increase | Cumulative Loss Ratio Excluding ALR Increase |
| 1           | 14,647,274                           | 14,647,274  | 332,089                                | 2.3%   | 14,647,274                           | 720,330                                | 4.9%   | 100.0%                            | 46.1%   | 46.1%  |
| 2           | 13,790,024                           | 13,790,024  | 1,481,430                              | 6.3%   | 12,819,681                           | 1,018,464                              | 6.3%   | 107.6%                            | 145.5%  | 99.8%  |
| 3           | 13,317,034                           | 13,353,657  | 648,778                                | 5.8%   | 11,569,814                           | 1,369,371                              | 7.9%   | 115.1%                            | 47.4%   | 74.4%  |
| 4           | 13,114,069                           | 13,476,073  | 1,044,066                              | 6.3%   | 10,637,028                           | 1,714,947                              | 9.5%   | 123.3%                            | 60.9%   | 66.1%  |
| 5           | 12,916,051                           | 13,960,117  | 3,070,454                              | 9.2%   | 9,848,274                            | 1,811,627                              | 10.8%  | 131.2%                            | 169.5%  | 84.6%  |
| 6           | 12,702,525                           | 14,701,247  | 3,566,903                              | 11.5%  | 9,125,944                            | 1,894,024                              | 12.0%  | 139.2%                            | 188.3%  | 96.1%  |
| 7           | 12,417,022                           | 15,663,398  | 2,856,765                              | 12.5%  | 8,444,040                            | 2,102,266                              | 13.2%  | 147.1%                            | 135.9%  | 94.3%  |
| 8           | 12,158,659                           | 16,908,114  | 3,909,756                              | 13.8%  | 7,799,381                            | 2,300,115                              | 14.5%  | 155.9%                            | 170.0%  | 95.3%  |
| 9           | 11,834,222                           | 18,119,465  | 5,516,941                              | 15.7%  | 7,190,547                            | 2,446,642                              | 15.7%  | 164.6%                            | 225.5%  | 99.8%  |
| 10          | 11,433,550                           | 19,096,986  | 6,104,240                              | 17.3%  | 6,616,367                            | 2,561,328                              | 16.9%  | 172.8%                            | 238.3%  | 102.5%                                       |
| 11          | 10,881,033                           | 19,644,330  | 5,681,751                              | 18.4%  | 6,075,638                            | 2,641,036                              | 18.1%  | 179.1%                            | 215.1%  | 101.6%                                       |
| 12          | 10,419,039                           | 20,285,140  | 6,891,245                              | 19.7%  | 5,568,799                            | 2,954,070                              | 19.4%  | 187.1%                            | 233.3%  | 101.4%                                       |
| 13          | 10,073,297                           | 20,931,291  | 6,089,173                              | 20.4%  | 5,095,022                            | 3,222,753                              | 20.8%  | 197.7%                            | 188.9%  | 98.1%  |
| 14          | 9,695,602                            | 21,179,900  | 9,983,079                              | 22.2%  | 4,652,296                            | 3,433,503                              | 22.2%  | 208.4%                            | 290.8%  | 100.0%                                       |
| 15          | 9,290,245                            | 21,119,260  | 9,879,741                              | 23.7%  | 4,240,158                            | 3,608,080                              | 23.7%  | 219.1%                            | 273.8%  | 100.2%                                       |
| 16          | 8,876,819                            | 20,939,993  | 14,999,875                             | 26.4%  | 3,855,893                            | 3,729,244                              | 25.1%  | 230.2%                            | 402.2%  | 104.9%                                       |
| 17          | 8,472,766                            | 20,753,253  | 12,795,874                             | 28.1%  | 3,497,949                            | 4,034,064                              | 26.6%  | 242.2%                            | 317.2%  | 105.5%                                       |
| 18          | 8,095,379                            | 20,525,292  | 14,582,975                             | 30.0%  | 3,163,840                            | 4,261,596                              | 28.2%  | 255.9%                            | 342.2%  | 106.6%                                       |
| 19          | 7,701,454                            | 20,225,977  | 15,164,546                             | 31.9%  | 2,852,095                            | 4,411,611                              | 29.7%  | 270.0%                            | 343.7%  | 107.2%                                       |
| 20          | 7,220,837                            | 19,851,716  | 12,804,767                             | 33.0%  | 2,561,887                            | 4,488,799                              | 31.2%  | 281.9%                            | 285.3%  | 105.8%                                       |
| 21          | 6,811,603                            | 19,776,183  | 17,562,812                             | 34.9%  | 2,293,854                            | 4,505,361                              | 32.7%  | 297.0%                            | 389.8%  | 106.9%                                       |
| 22          | 6,447,468                            | 19,703,915  | 21,830,414                             | 37.3%  | 2,046,654                            | 5,044,110                              | 34.3%  | 315.0%                            | 432.8%  | 108.8%                                       |
| 23          | 6,034,627                            | 19,257,002  | 22,571,132                             | 39.6%  | 1,819,655                            | 5,492,299                              | 36.0%  | 331.6%                            | 411.0%  | 110.0%                                       |
| 24          | 5,614,915                            | 18,561,912  | 29,961,180                             | 42.7%  | 1,611,129                            | 5,852,275                              | 37.7%  | 348.5%                            | 512.0%  | 113.1%                                       |
| 25          | 5,215,814                            | 17,677,871  | 29,854,062                             | 45.5%  | 1,425,496                            | 6,120,189                              | 39.5%  | 365.9%                            | 487.8%  | 115.3%                                       |
| 26          | 4,824,604                            | 16,572,453  | 33,453,744                             | 48.6%  | 1,255,013                            | 6,281,199                              | 41.2%  | 384.4%                            | 532.6%  | 118.0%                                       |
| 27          | 4,441,578                            | 15,347,934  | 35,467,755                             | 51.8%  | 1,100,660                            | 6,413,116                              | 42.9%  | 403.5%                            | 553.1%  | 120.7%                                       |
| 28          | 4,074,737                            | 14,124,882  | 37,900,074                             | 55.1%  | 960,313                              | 6,438,639                              | 44.6%  | 424.3%                            | 588.6%  | 123.6%                                       |
| 29          | 3,716,377                            | 12,913,288  | 40,390,029                             | 58.4%  | 833,317                              | 6,360,612                              | 46.1%  | 446.0%                            | 635.0%  | 126.7%                                       |
| 30          | 3,371,050                            | 11,737,068  | 42,176,407                             | 61.8%  | 718,475                              | 6,179,635                              | 47.6%  | 469.2%                            | 682.5%  | 129.9%                                       |
| 31          | 3,039,175                            | 10,601,446  | 43,826,844                             | 65.2%  | 615,761                              | 5,916,845                              | 48.9%  | 493.6%                            | 740.7%  | 133.2%                                       |
| 32          | 2,721,773                            | 9,511,437   | 45,023,176                             | 68.5%  | 524,479                              | 5,897,339                              | 50.2%  | 518.9%                            | 763.4%  | 136.4%                                       |
| 33          | 2,420,439                            | 8,473,058   | 45,735,646                             | 71.7%  | 443,336                              | 5,787,681                              | 51.4%  | 546.0%                            | 790.2%  | 139.6%                                       |
| 34          | 2,136,630                            | 7,491,957   | 46,177,328                             | 74.9%  | 371,043                              | 5,637,065                              | 52.5%  | 575.8%                            | 819.2%  | 142.6%                                       |
| 35          | 1,871,633                            | 6,573,106   | 45,739,828                             | 77.9%  | 312,628                              | 5,450,432                              | 53.6%  | 598.7%                            | 839.2%  | 145.4%                                       |
| 36          | 1,626,558                            | 5,720,926   | 44,977,731                             | 80.8%  | 261,316                              | 5,203,561                              | 54.5%  | 622.4%                            | 864.4%  | 148.0%                                       |
| 37          | 1,401,885                            | 4,937,693   | 43,728,141                             | 83.4%  | 217,294                              | 4,819,183                              | 55.4%  | 645.2%                            | 907.4%  | 150.6%                                       |
| 38          | 1,198,003                            | 4,225,290   | 41,957,935                             | 85.9%  | 178,998                              | 4,434,413                              | 56.2%  | 669.3%                            | 946.2%  | 152.9%                                       |
| 39          | 1,015,209                            | 3,585,196   | 39,762,214                             | 88.1%  | 146,703                              | 4,070,853                              | 56.8%  | 692.0%                            | 976.8%  | 155.1%                                       |
| 40          | 853,297                              | 3,017,116   | 36,951,616                             | 90.1%  | 118,844                              | 3,694,933                              | 57.4%  | 718.0%                            | 1000.1%   | 157.0%                                       |
| 41          | 711,566                              | 2,518,995   | 33,973,426                             | 91.9%  | 94,709                               | 3,300,962                              | 57.9%  | 751.3%                            | 1029.2%   | 158.7%                                       |
| 42          | 588,825                              | 2,086,994   | 30,844,114                             | 93.4%  | 74,608                               | 2,926,075                              | 58.3%  | 789.2%                            | 1054.1%   | 160.2%                                       |
| 43          | 483,677                              | 1,716,455   | 27,712,391                             | 94.8%  | 58,245                               | 2,540,551                              | 58.7%  | 830.4%                            | 1090.8%   | 161.6%                                       |
| 44          | 394,639                              | 1,402,316   | 24,637,317                             | 95.9%  | 42,939                               | 2,201,237                              | 59.0%  | 919.1%                            | 1119.2%   | 162.7%                                       |
| 45          | 320,035                              | 1,138,801   | 21,500,482                             | 96.9%  | 34,079                               | 1,954,624                              | 59.2%  | 939.1%                            | 1100.0%   | 163.6%                                       |
| 46          | 258,091                              | 919,759   | 18,576,519                             | 97.7%  | 26,927                               | 1,721,340                              | 59.4%  | 958.5%                            | 1079.2%   | 164.4%                                       |
| 47          | 207,045                              | 739,041   | 15,900,402                             | 98.3%  | 20,842                               | 1,404,544                              | 59.6%  | 993.4%                            | 1132.1%   | 165.0%                                       |
| 48          | 165,280                              | 590,996   | 13,554,629                             | 98.8%  | 15,827                               | 1,124,044                              | 59.7%  | 1044.3%                           | 1205.9%   | 165.6%                                       |
| 49          | 131,359                              | 470,589   | 11,489,029                             | 99.3%  | 11,866                               | 889,654                                | 59.8%  | 1107.0%                           | 1291.4%   | 166.0%                                       |
| 50          | 104,004                              | 373,331   | 9,608,256                              | 99.6%  | 8,635                                | 682,380                                | 59.9%  | 1204.4%                           | 1408.0%   | 166.4%                                       |
| 51          | 82,086                               | 295,270   | 7,981,021                              | 99.9%  | 6,102                                | 508,471                                | 59.9%  | 1345.3%                           | 1569.6%   | 166.7%                                       |
| 52          | 64,621                               | 232,954   | 6,591,883                              | 100.1%                                       | 4,319                                | 376,640                                | 59.9%  | 1496.3%                           | 1750.2%   | 167.0%                                       |
| 53          | 50,776                               | 183,459   | 5,441,115                              | 100.3%                                       | 2,606                                | 220,488                                | 60.0%  | 1948.3%                           | 2467.8%   | 167.2%                                       |
| 54          | 39,865                               | 144,374   | 4,482,632                              | 100.4%                                       | 1,259                                | 145,011                                | 60.0%  | 3166.2%                           | 3091.2%   | 167.4%                                       |
| 55          | 31,311                               | 113,675   | 3,673,171                              | 100.5%                                       | 974                                  | 125,879                                | 60.0%  | 3215.2%                           | 2918.0%   | 167.6%                                       |
| 56          | 24,637                               | 89,669  | 3,011,826                              | 100.6%                                       | 753                                  | 108,811                                | 60.0%  | 3273.6%                           | 2767.9%   | 167.7%                                       |
| 57          | 19,443                               | 70,950  | 2,469,590                              | 100.7%                                       | 555                                  | 84,130                                 | 60.0%  | 3503.5%                           | 2935.4%   | 167.8%                                       |
| 58          | 15,408                               | 56,379  | 2,035,655                              | 100.7%                                       | 400                                  | 63,512                                 | 60.0%  | 3852.5%                           | 3205.1%   | 167.8%                                       |
| 59          | 12,276                               | 45,042  | 1,698,164                              | 100.8%                                       | 289                                  | 47,933                                 | 60.0%  | 4251.9%                           | 3542.8%   | 167.9%                                       |
| 60          | 9,839                                | 36,196  | 1,419,604                              | 100.8%                                       | 200                                  | 34,409                                 | 60.0%  | 4919.9%                           | 4125.7%   | 167.9%                                       |
| 61          | 7,927                                | 29,243  | 1,205,210                              | 100.8%                                       | 134                                  | 23,450                                 | 60.0%  | 5928.8%                           | 5139.6%   | 168.0%                                       |
| 62          | 6,241                                | 23,136  | 981,649                                | 100.8%                                       | 85                                   | 14,854                                 | 60.0%  | 7360.1%                           | 6608.6%   | 168.0%                                       |
| 63          | 4,810                                | 17,974  | 775,704                                | 100.9%                                       | 37                                   | 4,472                                  | 60.0%  | 12889.7%                          | 17344.9%  | 168.0%                                       |
| 64          | 3,347                                | 12,705  | 584,396                                | 100.9%                                       |                                      |  | 60.0%  |                                   |   | 168.1%                                       |
| 65+         | 3,238                                | 12,635  | 764,266                                | 100.9%                                       |                                      |  | 60.0%  |                                   |   | 168.1%                                       |
| PV Lifetime | 171,014,841                          | 296,256,202   | 298,866,555                            | 100.9%                                       | 108,008,566                          | 64,823,211                             | 60.0%  | 158.3%                            | 461.0%  | 168.1%                                       |

**Exhibit IV**  
**Transamerica Life Insurance Company**  
**NEA Group**

**Blended If-Knew / Make-Up Approach (Minnesota method)\***

|  |               |
|--|---------------|
| % of Active Policyholders Remaining    | 50.6%         |
| If-Knew Increase                       | 191.6%        |
| Make-Up Increase                       | 2093.5%       |
| Blended Increase                       | 1153.7%       |
| Cost-Sharing Increase                  |               |
| 0-15%                                  | 15.00%        |
| 15-50%                                 | 31.50%        |
| 50-100%                                | 37.50%        |
| 100-150%                               | 32.50%        |
| >150%                                  | 501.87%       |
| <b>Maximum Allowable Rate Increase</b> | <b>108.4%</b> |

*\* Based off of Exhibit I*