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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,

Lorne Schinbein FSA, MAAA
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cc: Malinda A. Shepherd
Kentucky Department of Insurance