

State: Pennsylvania **Filing Company:** Continental Casualty Company
TOI/Sub-TOI: LTC03G Group Long Term Care/LTC03G.001 Qualified
Product Name: GLTC
Project Name/Number: PA - GLTC - RA19 - R1/

Filing at a Glance

Company: Continental Casualty Company
 Product Name: GLTC
 State: Pennsylvania
 TOI: LTC03G Group Long Term Care
 Sub-TOI: LTC03G.001 Qualified
 Filing Type: Rate - Other (Not M.U. or G.I. Product)
 Date Submitted: 02/04/2020
 SERFF Tr Num: CNAB-132209522
 SERFF Status: Assigned
 State Tr Num: CNAB-132209522
 State Status: Received Review in Progress
 Co Tr Num: PA - GLTC - RA19 - R1

 Implementation: On Approval
 Date Requested:
 Author(s): Louis Scarim, John Munro, Kimeya Koparkar, Avleen Badwal, Rafael Bergerman, Rebecca Butler
 Reviewer(s): Jim Laverty (primary)
 Disposition Date:
 Disposition Status:
 Implementation Date:

State Filing Description:

Continental Casualty Company is requesting a 28.5% rate increase on 3,224 PA certificate holders of the following group LTC forms in Pennsylvania: ?GLTC1? or P1-43636-A, ?GLTC2? or the SR-LTCP-Series, and ?Independent Solutions? or GLTC-3-P-xx-01.

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General Information

Project Name: PA - GLTC - RA19 - R1
Project Number:
Requested Filing Mode: Review & Approval
Explanation for Combination/Other:
Submission Type: New Submission
Group Market Type: Employer, Trust
Filing Status Changed: 02/05/2020
State Status Changed: 02/05/2020
Created By: Avleen Badwal
Corresponding Filing Tracking Number:
State TOI: LTC03G Group Long Term Care

Status of Filing in Domicile:
Date Approved in Domicile:
Domicile Status Comments:
Market Type: Group
Group Market Size: Small and Large
Overall Rate Impact: 28.5%

Deemer Date:
Submitted By: Avleen Badwal

State Sub-TOI: LTC03G.001 Qualified

Filing Description:

Please refer to the Cover Letter in the Supporting Documentation tab.

Company and Contact

Filing Contact Information

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Filing Company Information

Continental Casualty Company
151 N. Franklin Street
Chicago, IL 60606
(312) 822-4006 ext. [Phone]

CoCode: 20443
Group Code: 218
Group Name: CNA Insurance
Companies
FEIN Number: 36-2114545

State of Domicile: Illinois
Company Type: Property and
Casualty
State ID Number:

Filing Fees

Fee Required? No
Retaliatory? No
Fee Explanation:

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Rate Information

Rate data applies to filing.

Filing Method: SERFF
Rate Change Type: Increase
Overall Percentage of Last Rate Revision: 20.000%
Effective Date of Last Rate Revision: 03/01/2019
Filing Method of Last Filing: SERFF
SERFF Tracking Number of Last Filing: CNAB-131580664

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Continental Casualty Company	28.500%	28.500%	\$1,096,831	3,224	\$5,041,923	69.900%	19.100%

SERFF Tracking #:

CNAB-132209522

State Tracking #:

CNAB-132209522

Company Tracking #:

PA - GLTC - RA19 - R1

State:

Pennsylvania

Filing Company:

Continental Casualty Company

TOI/Sub-TOI:

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Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		Rate Sheet Supplement	P1-43636-A, SR-LTCP-Series, GLTC-3-P-xx-01	Revised	Previous State Filing Number: CNAB-131580664 Percent Rate Change Request: 28.5	Rate Sheet Supplement - PA.pdf,

THIS POLICY IS FOR RENEWAL BUSINESS ONLY

CONTINENTAL CASUALTY COMPANY

PENNSYLVANIA

Group Long Term Care

Supplement to Rate Sheets for Policy Forms:

“GLTC1” P1-43636-A, et al

“GLTC2” SR-LTCP-Series, et al

“Independent Solutions” GLTC-3-P-xx-01, et al

Rates in the above forms should be multiplied by the following factors:

Inflation Type	Factor to Apply
Standard Lifetime	2.935872
Other	2.058048
None	2.058048

These factors reflect the following prior approved and current rate increases:

Prior Approved Rate Increases		
Approval Date of Rate Increase	Effective Date of Rate Increase	Rate Increase Approved
1/12/2016	9/1/2016	20.0%
1/12/2016	9/1/2017	20.0%
9/26/2018	3/1/2019	20.0%

Current Rate Increase	
Inflation Type	Increase
Standard Lifetime	69.9%
Other	19.1%
None	19.1%

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Supporting Document Schedules

Bypassed - Item:	Transmittal Letter (A&H)
Bypass Reason:	Not applicable as this is a rate increase filing.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Certification (A&H)
Comments:	The Actuarial Certification can be found in the Actuarial Memorandum.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Memorandum and Explanatory Information (A&H)
Comments:	Please see attached for the Actuarial Memorandum and supporting exhibits.
Attachment(s):	Actuarial Memorandum and Exhibits.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Advertisements (A&H)
Bypass Reason:	Not applicable as Advertisements are not included and will not be filed.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Authorization to File (A&H)
Bypass Reason:	Not applicable as the insurer is the filer.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Insert Page Explanation (A&H)
Bypass Reason:	Not applicable as this filing does not include insert pages.
Attachment(s):	
Item Status:	
Status Date:	

SERFF Tracking #:

CNAB-132209522

State Tracking #:

CNAB-132209522

Company Tracking #:

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Continental Casualty Company

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Bypassed - Item:	Rate Table (A&H)
Bypass Reason:	Not applicable as new forms are not being submitted.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Replacement Form with Highlighted Changes (A&H)
Bypass Reason:	Not applicable as this is not a form filing.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Advertisement Compliance Certification
Bypass Reason:	Not applicable as this filing does not include Advertisements.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Reserve Calculation (A&H)
Bypass Reason:	Not applicable as this is not a new form filing.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Variability Explanation (A&H)
Bypass Reason:	Not applicable as this is not a form filing.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Cover Letter
Comments:	Please see attached.
Attachment(s):	Cover Letter - PA.pdf
Item Status:	
Status Date:	

**Continental Casualty Company (“CCC”)
Actuarial Memorandum
In Support of a Premium Rate Increase Request
Pennsylvania**

The following group long term care policy forms subject to this rate increase request were originally issued nationwide during the calendar years referenced below:

Policy Form	Product Name	Originally Issued	Closed to New Groups
P1-43636-A, et al	GLTC 1	1988	1994
SR-LTCP et al	GLTC 2	1994	2003
GLTC-3-P-xx-01 et al	Independent Solutions	2003	2011

This long term care insurance was provided under group policies issued to cover eligible employees of an employer, and at the option of the employer, retirees and/or family members of eligible employees who meet eligibility requirements. In addition, the SR-LTCP-Series form was marketed through a small number of associations.

1. Purpose and Justification of Filing

The purpose of this memorandum is to provide actuarial information supporting CCC’s request for a rate increase for the above-listed policy forms, including all associated riders. This increase is requested in order to establish premium rates that are reasonable in relation to benefits based on actual historical experience and best-estimate projections for these forms. This rate filing is not intended to be used for other purposes.

In 2015, the company began a nationwide rate increase program for the above-listed policy forms due to significant deterioration of nationwide lifetime loss ratios based on the Company’s best-estimate projections. This was the first time a rate increase had been requested on these policy forms. In this program, 95.5% was requested in every state¹ in order to get the block to a 77% lifetime loss ratio. Since this time, however, further deterioration in experience has necessitated the need for additional rate increases. This rate increase indication varies by benefit feature, specifically the lifetime automatic benefit increase (“ABI”) benefit, as follows:

Benefit Feature	Requested Rate Increase
Insureds without Standard Lifetime ABI	19.1%
Insureds with Standard Lifetime ABI	69.9%
Weighted Average Total (Based on Pennsylvania’s Premium Distribution)	28.5%

¹ Except in those jurisdictions that impose annual limits

To the extent that states do not implement the requested amounts, it is the intent of management to submit follow-up filings, where not otherwise limited by law or regulation, such that an actuarially equivalent increase amount is attained.

Upon approval of this rate revision, CCC will communicate to certificate holders their options to reduce the impact of the rate increase. When insureds are notified of the rate increase, they will be encouraged to call our customer service staff and discuss these options if they so desire. Available options will depend upon the insured's current coverage levels, benefit options available under their group plan, and any statutory minimum benefit levels in your state.

Although many insureds have contractual non-forfeiture benefits, the Company is making a non-forfeiture option available for all insureds in conjunction with this rate increase. This option provides a paid-up policy with benefits equal to the total of premiums paid, less any claims paid since the original policy was issued.

Although certain policy forms were originally priced prior to rate stability under the NAIC model regulation, certificates have been added after rate stability. Therefore, this filing is being made according to rate stability requirements. The rate increase being requested meets the 58/85 loss ratio test established in the 2000 LTC NAIC Model Regulation.

2. Description of Benefits

Form P1-43636-A (i.e. GLTC 1):

- This form provides a daily benefit for long term care received at home or a nursing facility. Qualification for benefits is met by the inability to perform at least two of a set of five activities of daily living (ADLs). The full daily benefit (facility benefit or home health care benefit, as applicable) is payable for each day that care is received by a covered provider. Benefits begin after the elimination period and are payable until impairment ends or the maximum benefit (expressed as a multiple times the facility daily benefit) are paid out. Available lifetime maximum benefits are (multiples of the daily facility benefit) 1,500x, 1,825x, 2,000x, 3,000x, 4,000x, 5,000x, and an option for an overall maximum of \$1 million.
- *Optional Benefits:* The form was originally offered with options regarding whether prior hospitalization would be required to obtain benefits, or whether prior facility care would be required to receive home care benefits. No policies were sold with those restrictions. Other options offered were a respite benefit and a 10 year simple ABI option.

Form SR-LTCP-Series (i.e. GLTC 2):

- This form provides a daily benefit for long term care received at home, an assisted living facility, or a nursing facility. Benefits are payable in the event the insured is impaired in a stated number of ADLs or is cognitively impaired after the appropriate elimination period has been satisfied. The policy form was available on an expense incurred (reimburse actual cost up to a daily benefit) or

indemnity (pay a daily benefit for each day qualifying care was received) basis. Lifetime maximum benefits are defined as an aggregate dollar amount that is a multiple of the facility daily benefit. Available lifetime maximum benefits are (multiples of the daily facility benefit) 730x, 1,095x, 1,460x, 1,500x, 1,825x, 2,000x, 2,190x, 2,555x, 3,000x, 3,650x, 4,000x, or 5,000x, and an option for an unlimited lifetime maximum benefit. Benefits for home based care are available at 50% to 100% of the daily facility benefit, depending on the level chosen by the insured.

- *Other Benefits:* The form also includes benefits for bed reservation, respite care, waiver of premium, home medical technology, caregiver training, and alternate plan of care.
- *Optional Benefits:* The form may have also included benefit options for additional respite care, family respite care, informal caregiver, worldwide coverage, restoration of benefits, non-forfeiture, and refund of premium upon death. Insureds may have had the option of selecting an ABI option. If the insured did not elect an ABI option, a guaranteed benefit increase option was provided. This option allows the insured to periodically buy-up additional amounts of coverage.

Form GLTC-3-P-xx-01 (i.e. Independent Solutions):

- This form is similar to SR-LTCP-Series. The most significant difference is that independent providers (e.g., certified nurses' aides, etc.) are included as covered providers.

3. Renewability

These forms provide the insured guaranteed renewable group long term care coverage.

4. Applicability of Rate Increase

The new premium rates will be applied to all insureds under group policies that were situated in your state except insureds under the group policies situated in your state that were issued certificates in a state that is an extraterritorial (ET) jurisdiction. These insureds are governed by the ET state's laws and regulations and will be included in that state for rate increase purposes.

The premium increase contained in this memorandum will be applicable to all insureds of the policy forms and riders described in Section 1 as well as all future periodic buy-up offers.

5. Experience Study and Actuarial Assumptions

This section provides a summary of the results of the annual experience study, along with the resulting assumptions utilized in the projection model. These liability assumptions below are consistent with the assumptions being used in the Company's reserve adequacy and asset adequacy testing. It is noted that some actual to expected ("A/E") analysis tables in this section have A/E ratios other than 100%. In order to reduce year over year volatility, if A/E results from the experience study are within an internal target range, the assumption will not be revised from the prior year's assumption.

Morbidity Overview

CCC has a sizeable block of LTC policies with a robust and credible amount of claims experience. As such, the 2018 morbidity study used experience from 2008 to 2017 to develop frequency and severity (claim utilization, disabled life mortality, and claim recovery) assumptions. CCC assesses morbidity experience separately for the Individual Long-Term Care (ILTC) and Group Long-Term Care (GLTC) blocks of business. Furthermore, any variation in assumption by different policyholder characteristics (i.e. gender) is based on company experience where meaningful variation has existed and is expected to continue in the future. Assumptions are set at a granular level to provide the best possible fit to experience. A dynamic validation is then performed to ensure that assumptions provide a reasonable fit in the aggregate. The dynamic validation was performed by modeling best-estimate assumptions with inforce liability data as of December 31, 2011 to see how well the assumptions would replicate actual historical experience.

For policyholders aged 85 and older, ILTC has approximately over 300K exposure years and over 40K claims, and GLTC has over 13K exposure years with over 2K claims. For older attained ages with less credible data, CCC has set incidence, claim recovery and utilization assumptions using age bands where assumptions do not vary beyond a certain age threshold. Disabled life mortality varies by attained age and is based on an impaired 2012 IAM mortality table which assumes an ultimate mortality rate beyond age 110.

Morbidity experience can vary by carrier to carrier based on policy language, claim adjudication practices and rate increase programs undertaken. None of these differences are captured in industry studies. Given the fact that CCC has credible and robust claims experience, assumptions were set entirely based on company experience and were not directly compared to industry data.

The ILTC block is at or near its peak so the number of new incurred claims has been slowing over the recent past and is near its inflection point. GLTC is a younger block and the number of new incurred claims is expected to continue to increase over the next twenty to thirty years. Also, within the study period mentioned above, CCC has implemented ILTC and GLTC rate increase programs which have temporarily increased incidence due to anti-selection.

The amount of new incurred claim dollars has increased over the recent past due to increases in the cost of care. Incurred claim dollars are expected to continue to increase for both ILTC and GLTC over the near to mid-term.

CCC has granular assumptions which allows for variation in lapse rates. One variation that is worth noting is the assumption that lapse rates are expected to be lower for policies with richer benefits (i.e. policies with longer benefit periods and with contractual ABI). Therefore, as the block ages, there is an expectation that the policies that persist will naturally have longer lengths of stay with higher severity as the mix shift changes over time. Also assumed in the claim utilization assumption is an expectation of rising cost of care inflation which will also lead to higher severity of claims over time.

Claim Incidence

The frequency of claim is the probability that a healthy insured will go into disabled status, also known as 'claim incidence'. The final incidence rate that gets modeled is comprised of a base incidence table, adjustment factors based on policy features and demographics, and adjustments for policyholder behavior to rate actions.

Base Incidence Actual to Expected Analysis

The below table summarizes the results of the experience study for GLTC base incidence rates, which includes experience over the past nine years:

Best-Estimate Incidence A/E Results Group Long Term Care						
Calendar Year	Exposures (Years)	Actual Claims	Expected Claims	Actual Incidence Rate	Expected Incidence Rate	Actual / Expected
2009	209,093	445	460	0.21%	0.22%	97%
2010	223,108	483	511	0.22%	0.23%	94%
2011	222,956	482	559	0.22%	0.25%	86%
2012	221,966	553	611	0.25%	0.28%	90%
2013	226,221	690	668	0.31%	0.30%	103%
2014	222,882	682	725	0.31%	0.33%	94%
2015	218,818	802	797	0.37%	0.36%	101%
2016	208,440	1,049	861	0.50%	0.41%	122%
2017	189,971	897	873	0.47%	0.46%	103%
Total	1,943,456	6,083	6,066	0.31%	0.31%	100%

Base Incidence Assumption

The base incidence rates are single-dimensional tables that vary by attained age. These base incidence tables vary by the following:

- Whether the policy covers comprehensive or facility only benefits
- The situs of the claim (Nursing Home or Home Health Care)
- Gender

A sample table is shown below:

Plan Type: Comprehensive

Situs: Nursing Home

Gender: Female

Attained Age	Annual Incidence Rate (%)
44 and Prior	0.0111%
45	0.0117%
46	0.0129%
47	0.0138%
...	...
55	0.0232%
56	0.0250%
57	0.0274%
...	...
65	0.0611%
66	0.0674%
67	0.0834%
...	...
75	0.3705%
76	0.4401%
77	0.5638%
...	...
85	2.2257%
86	2.5572%
87	2.8709%
...	...
95	6.3876%
96 to 120	7.1175%

Incidence Rate Adjustment Factors

There are a number of incidence rate adjustment factors that are applied to adjust the base incidence tables for various policy features. The annual experience study reviews these adjustment factors and provides updates as needed. These assumptions were determined by applying scalars to the prior year assumption to bring the A/E ratio close to 100%. Note that 2017 experience was not used because of suspected anti-selection from rate increases. The incidence adjustment factors are shown below:

Category	Variable/Benefit Feature	Adjustment Factor
Elimination Period	<90 Days	1.06
	90+ Days	0.98
Benefit Period	Lifetime	1.35
	Non-Lifetime	1.00
Tax Status	Tax Qualified	1.00

	Non-Tax Qualified	0.94
Plan Type	Comprehensive	1.06
	Facility Only	1.02
Benefit Type	Expense	1.00
	Indemnity	0.95
Product Portfolio	GLTC 1	1.00
	GLTC 2	1.10
	Independent Solutions	1.00

Temporary Anti-Selection Overview

As part of the company's annual experience study, the relationship between premium rate actions and incidence rates were developed into an assumption set. When a rate increase is approved in a state, the company has observed an uptick in claims in that state, which is estimated to be driven by insureds that already qualify for their long term care benefits, but have not yet gone on claim. This observed uptick in claims following a rate action is theorized to be driven by this subset of insureds that currently qualify for benefits going on claim to avoid paying the increased premium, since their premium rates will be waived. This anti-selection is believed to be temporary in nature and that incidence rates will eventually return to a more normalized level.

For anti-selection assumptions, actual total incidence counts, which include both pre- and post-rate increase experience, were compared to expected base incidence counts to develop an anti-selection assumption that represents the incidence in excess of base. This analysis was done by looking at the years since a rate increase occurred so the pattern of anti-selection across policies could be observed. For the GLTC business, there is minimal credibility given one year of full post-rate increase experience and therefore uses 25% of the ILTC Preferred Solution assumption (reflective of the fact that GLTC is younger and not as likely to be benefit eligible).

The below table outlines the assumed incidence rate adjustment factors resulting from temporary anti-selection for the GLTC block:

Years Since Rate Increase	Temporary Anti-Selection Factors
0	1.1100
1	1.1675
2	1.1850
3	1.0675
4	1.0425
5	1.0300
6+	1.0000

Future Incidence Improvement (i.e. Morbidity Improvement)

No future incidence improvement is assumed.

Model Calibration

The morbidity assumptions are intended to reflect the best-estimate of the long term. Long-Term Care policies are complex and have multiple decrements. Assumptions are developed independently and when combined in the model, they do not always produce results that seem reasonable. Model calibration is performed when necessary to fit the model to the long term view.

A dynamic validation was performed by modeling our best-estimate assumptions with inforce liability data as of December 31, 2011 to see how well the assumptions would replicate actual historical experience. This analysis was performed separately for ILTC and GLTC. Based on how well the model 'fits' actual claims experience, additional incidence calibration factors may be applied. Given the modeled claims 'fit' with actual experience, calibration factors were set to 1.0.

Claim Severity

In the projection system, the severity of claim is the associated length and cost of a claim once an insured becomes disabled (or is already disabled). The severity of a claim is driven by three key assumptions:

- Recovery
- Utilization
- Disabled Life Mortality

A further breakdown of these three components is described below.

Recovery Overview

Once a policyholder is on claim, there is an associated probability that the policyholder will recover back in to a 'healthy' status prior to death or exhausting benefits. This is the recovery rate assumption in the projection model.

Recovery Actual to Expected Analysis

The below table summarizes the results of the experience study for GLTC recovery rates, which includes experience over the past seven years:

**Best-Estimate Recovery A/E Results
Group Long Term Care**

Calendar Year	Actuals			Current Claims			Future Claims		
	Exposures (Months)	Actual Recoveries	Actual Recovery Rate	Expected Recoveries	Expected Recovery Rate	Actual / Expected	Expected Recoveries	Expected Recovery Rate	Actual / Expected
2011	14,613	113	9.3%	96	7.9%	117%	94	7.7%	120%
2012	15,901	62	4.7%	102	7.7%	61%	101	7.6%	62%
2013	18,221	94	6.2%	122	8.0%	77%	121	7.9%	78%
2014	20,267	108	6.4%	131	7.8%	82%	130	7.7%	83%
2015	22,351	137	7.4%	142	7.6%	96%	144	7.8%	95%
2016	25,720	186	8.7%	168	7.8%	111%	175	8.1%	107%
2017	27,412	234	10.2%	168	7.4%	139%	175	7.7%	134%
Total	144,483	934	7.8%	930	7.7%	100%	939	7.8%	99%

Recovery Assumption

The recovery tables are two-dimensional that vary by age of disability and disability duration. The first five years of the tables contain monthly rates and are annual thereafter. The recovery tables vary by the following:

- Benefit period (lifetime vs non-lifetime)
- Gender
- The situs of the claim (Nursing Home or Home Health Care)
- Diagnosis of the claim (for insureds currently on claim)

Insureds that are currently in claim status have a known situs of care, so the recovery rates will be different than a policy currently in healthy status, since the future claim situs is unknown.

A sample table is shown below for sample ages of disablement (rates shown are on a monthly basis):

Insured Status: Healthy

Gender: Male

Benefit Period: Non-Lifetime

Situs: Nursing Home (original, since policy is healthy)

Diagnosis: N/A (since status is healthy)

Disability Month	Disablement Age			
	65	75	85	95
1	0.83%	0.70%	0.57%	0.58%
2	0.91%	0.71%	0.54%	0.56%
3	1.33%	1.00%	0.73%	0.76%

4	1.11%	0.80%	0.56%	0.59%
5	1.16%	0.83%	0.57%	0.60%
6	0.94%	0.64%	0.42%	0.45%
7	2.11%	1.35%	0.80%	0.87%
8	1.62%	1.04%	0.61%	0.67%
9	1.21%	0.77%	0.45%	0.49%
10	1.06%	0.68%	0.40%	0.44%
11	0.99%	0.64%	0.37%	0.41%
12	0.92%	0.59%	0.35%	0.38%
...

Utilization Overview

The utilization assumption in the model for expense reimbursement policies represents the amounts, or severity, of paid claims and include components for cost of care, coverage available and the intensity of care (“health trend”). The available benefit is also considered by capping paid claims at the daily benefit amount.

Expense reimbursement refers to policies that are reimbursed up to the maximum daily benefit. They are considered separately from indemnity policies because indemnity policies pay the full maximum daily benefit. Expense reimbursement claim amounts are affected by cost of care inflation, intensity of care (referred to as “health trend”), and the amount of initial coverage purchased.

Health trends represent the intensity of care needed for claimants. Health trend is the ratio of inflation-adjusted paid claims divided by initial available benefits:

$$\text{Health Trend} = \frac{\text{Paid Claim}}{\frac{(1 + \text{CostOfCare Inflation})^{(\text{Experience Year} - \text{Issue Year})}}{\text{Initial Available Benefits}}}$$

Indemnity policies have separate utilization assumptions from expense reimbursement policies because they pay their full available benefits and are not dependent on cost or intensity of care. Although indemnity policies pay the full maximum daily benefit, utilization rates are still below 100% because insureds are not in facilities 100% of the time. For example, if an insured is only in a facility 28 out of the 30 days in each month, then they would have a utilization rate equal to 28/30 = 93%. This is because benefit periods are based on service days and not strictly calendar days.

Prospective cost of care inflation is directionally tied to future interest rate expectations.

Utilization Actual to Expected Analysis

The below table summarizes the results of the experience study for GLTC utilization rates, which includes experience over the past seven years:

**Best-Estimate Utilization A/E Results
Group Long Term Care**

Calendar Year	Current Claims						Future Claims					
	Maximum Available Benefit (\$millions)	Actual Paid Claims (\$millions)	Actual Utilization Rate	Expected Paid Claims (\$millions)	Expected Utilization Rate	Actual / Expected	Maximum Available Benefit (\$millions)	Actual Paid Claims (\$millions)	Actual Utilization Rate	Expected Paid Claims (\$millions)	Expected Utilization Rate	Actual / Expected
2011	56	25	45.1%	24	44.0%	102%	57	27	46.7%	26	46.1%	101%
2012	62	28	45.3%	28	45.2%	100%	64	30	46.8%	30	47.1%	100%
2013	73	33	45.9%	33	45.7%	100%	74	35	47.2%	35	47.1%	100%
2014	83	40	47.8%	39	47.2%	101%	85	42	49.1%	41	48.4%	101%
2015	94	44	47.5%	46	49.1%	97%	96	47	48.9%	48	49.5%	99%
2016	108	50	46.2%	50	46.1%	100%	112	53	47.6%	53	47.6%	100%
2017	121	58	48.0%	58	48.0%	100%	124	61	49.1%	61	49.5%	99%
Total	596	279	46.7%	279	46.8%	100%	611	294	48.1%	294	48.1%	100%

Utilization Assumption

The health trend component of utilization tables are two-dimensional that vary by age of disability and disability duration. The first five years of the tables contain monthly rates and are annual thereafter. These tables vary by the following:

- ABI Rider (Yes or No)
- Home health care percentage (0%, 1%-50%, 50%-75%, 75%+)
- The situs of the claim (Nursing Home or Home Health Care)
- Payment type (indemnity vs reimbursement)
- Diagnosis of the claim (for insureds currently on claim)

Insureds that are currently in claim status have a known situs of care, so the utilization rates will be different than a policy currently in healthy status, since the future claim situs is unknown.

A sample health trend table is shown below for sample ages of disablement (rates shown are on a monthly basis):

Insured Status: Healthy

ABI Rider: Yes

Home Health Care Percentage: 75%

Situs: Nursing Home (original, since policy is healthy)

Payment Type: Reimbursement

Diagnosis: N/A (since status is healthy)

Disability Month	Disablement Age			
	65	75	85	95
1	77%	83%	85%	89%
2	49%	53%	54%	57%
3	41%	44%	45%	47%
4	43%	46%	47%	50%
5	51%	55%	57%	60%
6	56%	61%	62%	65%
7	54%	59%	60%	63%
8	55%	59%	61%	64%
9	57%	61%	63%	66%
10	58%	63%	65%	68%
11	59%	63%	65%	68%
12	61%	65%	67%	70%
...

Cost of care tables are one-dimensional vectors that vary by calendar year and ABI type for reimbursement policies. A sample cost of care inflation table is provided below:

ABI Type: Compound

Calendar Year	Cost of Care Inflation Rate
Historic (Prior to Projection Date)	4.3%
Prospective (After Projection Date)	5.0%

Disabled Life Mortality Overview

Once an insured is on claim, there is an associated probability that the insured will decrement due to death, which influences the overall length of a claim. Generally, the probability of death from a currently disabled insured is greater than the probability associated with a currently healthy insured, so separate assumptions are developed and modeled.

Disabled Life Mortality Actual to Expected Analysis

The below table summarizes the results of the experience study for GLTC disabled mortality rates, which includes experience over the past seven years:

Best-Estimate Disabled Mortality A/E Results Group Long Term Care									
Calendar Year	Actuals			Current Claims			Future Claims		
	Exposures (months)	Disabled Deaths	Disabled Mortality Rate	Expected Disabled Deaths	Expected Disabled Mortality Rate	Actual / Expected	Expected Disabled Deaths	Expected Disabled Mortality Rate	Actual / Expected
2011	14,613	292	24.0%	281	23.1%	104%	284	23.3%	103%
2012	15,901	307	23.2%	310	23.4%	99%	313	23.6%	98%
2013	18,221	352	23.2%	367	24.2%	96%	372	24.5%	95%
2014	20,267	362	21.4%	410	24.3%	88%	413	24.5%	88%
2015	22,351	458	24.6%	466	25.0%	98%	468	25.1%	98%
2016	25,720	569	26.5%	564	26.3%	101%	559	26.1%	102%
2017	27,412	619	27.1%	600	26.3%	103%	590	25.8%	105%
Total	144,483	2,959	24.6%	2,998	24.9%	99%	2,999	24.9%	99%

Disabled Life Mortality Assumption

The disabled life mortality rates are two-dimensional tables that vary by age of disability and disability duration. Similar to the other severity assumptions, the first five years of the tables contain monthly rates and are annual thereafter. The disabled life mortality tables vary by the following:

- Benefit period (lifetime vs non-lifetime)
- The situs of the claim (Nursing Home or Home Health Care)
- Gender
- Diagnosis of the claim (for insureds currently on claim)

Insureds that are currently in claim status have a known situs of care, so the disabled life mortality rates will be different than a policy currently in healthy status, since the future claim situs is unknown.

A sample table is shown below for sample ages of disablement (rates shown are on a monthly basis):

Insured Status: Healthy

Benefit Period: Non-Lifetime

Situs: Home Health Care (original, since policy is healthy)

Gender: Female

Diagnosis: N/A (since status is healthy)

Disability Month	Disablement Age			
	65	75	85	95
1	1.37%	1.13%	0.91%	0.93%

2	1.54%	1.18%	0.88%	0.91%
3	2.28%	1.68%	1.21%	1.26%
4	1.72%	1.24%	0.87%	0.91%
5	2.43%	1.68%	1.11%	1.18%
6	1.80%	1.22%	0.78%	0.83%
7	4.84%	3.10%	1.82%	1.98%
8	3.72%	2.38%	1.40%	1.53%
9	2.76%	1.77%	1.04%	1.13%
10	2.44%	1.56%	0.92%	1.00%
11	2.28%	1.46%	0.86%	0.93%
12	2.11%	1.35%	0.80%	0.87%
...

Transitions of Situs

Following the annual claim reserve review, adjustments were made to the assumptions to account for transitions of situs. For 2018, a multiplier of 120% was applied to utilization, a multiplier of 92.5% was applied to disabled life mortality (for claim durations seven and later) and a multiplier of 95% was applied to recovery rates for current claims. Furthermore, multipliers of 110% and 80% were applied to disabled life mortality for the first six claim durations for current and future claims respectively. A 10% reserve development haircut was also applied to pending claims. The result of these adjustments produced smoother claim development and a better fit in the dynamic validation..

Persistency

In the projection system, the persistency assumptions relate to the probability that policyholders not on claim will lapse or die. Policyholder reduced benefit options are considered part of the persistency assumption and are modeled as partial lapses in the projection system. The persistency of an insured is driven by four key assumptions:

- Voluntary Lapse
- Shock Lapse and Reduced Benefit Option (“RBO”)
- Healthy Life Mortality
- Healthy Life Mortality Improvement

A further breakdown of these components is described below.

Voluntary Lapse Overview

The voluntary lapse assumption reflects the probability associated with an insured voluntarily canceling their policy. The voluntary lapse rates differ from shock lapse rates in that the policy cancelation is not due to a rate increase notification.

Voluntary Lapse Actual to Expected Analysis

The below table summarizes the results of the experience study for GLTC voluntary lapse rates, which includes experience over the past seven years:

Best-Estimate Voluntary Lapse A/E Results Group Long Term Care						
Calendar Year	Exposures (Years)	Actual Lapse	Expected Lapse	Actual Lapse Rate	Expected Lapse Rate	Actual / Expected
2011	227,425	10,313	10,891	4.53%	4.79%	95%
2012	226,214	9,490	10,017	4.20%	4.43%	95%
2013	230,720	10,045	10,248	4.35%	4.44%	98%
2014	227,022	9,017	9,286	3.97%	4.09%	97%
2015	222,736	8,899	8,408	4.00%	3.77%	106%
2016	214,160	7,480	7,249	3.49%	3.38%	103%
2017	195,262	5,670	5,648	2.90%	2.89%	100%
Total	1,543,539	60,914	61,746	3.95%	4.00%	99%

Voluntary Lapse Assumption

The voluntary lapse tables are two-dimensional varying by issue age and policy duration. The voluntary lapse assumptions vary by the following:

- ABI Rider (Yes or No)
- Limited-pay option (10 pay, Age 65, 20 pay, 25 pay) – set to 0% lapse after payment period expires

A sample voluntary lapse table is shown below for sample issue ages:

ABI Rider: Yes

Limited Pay: No

Policy Duration	Issue Age			
	35	45	55	65
1	18.97%	12.41%	8.72%	8.01%
2	13.76%	9.01%	5.55%	4.86%
3	10.30%	6.74%	4.46%	3.49%
4	8.80%	5.76%	3.55%	2.73%
5	7.90%	5.17%	3.47%	2.43%

6	7.59%	4.96%	3.33%	2.23%
7	6.73%	4.40%	3.23%	1.86%
8	6.12%	4.00%	2.93%	1.76%
9	5.14%	3.36%	2.32%	1.36%
10	4.40%	2.88%	2.12%	1.36%
11	3.63%	2.44%	1.87%	1.29%
12	3.80%	2.64%	2.13%	1.57%
13	3.16%	2.29%	1.97%	1.57%
14	3.20%	2.48%	2.30%	2.00%
15	2.39%	2.05%	2.10%	2.00%
16	1.59%	1.63%	1.92%	2.02%
17	1.59%	1.63%	1.92%	2.02%
18	1.59%	1.63%	1.92%	2.02%
19	1.59%	1.63%	1.92%	2.02%
20	1.36%	1.39%	1.64%	1.73%
21+ (Ultimate)	1.06%	1.08%	1.28%	1.34%

Shock Lapse and Reduced Benefit Option

The shock lapse and RBO assumptions are modeled as a temporary increase in lapse rates in response to a rate increase. Shock lapse and RBO assumptions are determined by calculating the lapse rates in excess of base lapse rates during the years when a premium rate action occurs.

The assumed rates for each of these components are outlined in the below table:

Rate Increase	Shock Lapse %	RBO %	Total Additional Lapse % from Shock and RBO*
0%	0.0%	0.0%	0.0%
5%	0.8%	0.1%	0.8%
10%	1.5%	0.2%	1.7%
15%	2.3%	0.4%	2.7%
20%	3.0%	0.7%	3.7%
25%	3.8%	1.0%	4.7%
30%	4.5%	1.2%	5.7%
35%	5.3%	1.5%	6.7%
40%	6.0%	1.8%	7.7%
45%	6.8%	2.0%	8.6%
50%	7.5%	2.3%	9.6%
55%	8.3%	2.5%	10.6%
60%	9.0%	2.8%	11.6%
65%	9.8%	3.1%	12.5%
70%	10.5%	3.3%	13.5%

75%	11.3%	3.6%	14.4%
80%	12.0%	3.9%	15.4%
85%	12.8%	4.1%	16.3%
90%	13.5%	4.4%	17.3%
95%	14.3%	4.6%	18.2%
100%	15.0%	4.9%	19.2%
...

*Total Additional Lapse % from Shock and RBO = $1 - (1 - \text{Shock Lapse \%}) * (1 - \text{RBO \%})$

Healthy Life Mortality Overview

The healthy life mortality assumption is the probability of death associated with currently healthy insureds.

Healthy Life Mortality Actual to Expected Analysis

The below table summarizes the results of the experience study for GLTC healthy life mortality rates, which includes experience over the past seven years:

Best-Estimate Healthy Life Mortality A/E Results Group Long Term Care						
Calendar Year	Exposures (Years)	Actual Death	Expected Death	Actual Death Rate	Expected Death Rate	Actual / Expected
2011	223,154	973	1,001	0.44%	0.45%	97%
2012	222,163	1,032	1,058	0.46%	0.48%	97%
2013	226,411	1,110	1,121	0.49%	0.50%	99%
2014	223,096	1,226	1,179	0.55%	0.53%	104%
2015	219,015	1,191	1,246	0.54%	0.57%	96%
2016	208,454	1,222	1,288	0.59%	0.62%	95%
2017	190,070	1,188	1,264	0.63%	0.67%	94%
Total	1,512,362	7,942	8,159	0.53%	0.54%	97%

Healthy Life Mortality Assumption

The base table for the healthy life mortality assumption is the 2012 IAM table, with additional multipliers based on company experience. There are also adjustments at higher attained ages, due to lack of credibility. At higher ages, the assumptions grade their credibility weighting from 100% of the best-estimate assumption at age 90, to 100% of the 2012 IAM tables at ages 104 and later. These base tables vary by gender and attained age. The additional multipliers to these base tables based on CCC's experience are as follows:

Category	Variable/Benefit Feature	Adjustment Factors
Attained Age	0-59	97%
	60-64	88%
	65-69	82%
	70-74	98%
	75-79	97%
	80-84	101%
	85-89	100%
	>=90	118%
Gender	Male	62%
	Female	66%

Healthy Life Mortality Improvement

A healthy life mortality improvement factor is applied to the base healthy mortality table to reflect studies that examine the improvement of population mortality over time, based on improvement scale G2. The healthy life mortality improvement varies by gender and attained age with improvement beginning 1/1/2015 for 10 years. An example is shown below for reference:

Gender: Female

Attained Age	Annualized Improvement
<=50	1.00%
50	1.00%
60	1.30%
70	1.30%
80	1.30%
90	0.60%
100	0.20%
105	0.00%

Discount Rate

The inforce count-weighted average maximum statutory valuation interest rate for contract reserves is used to accumulate past actual experience and discount future expectations, 4.35%.

Expenses

This filing is based on loss ratios and expense levels have not been considered. Commissions are not paid on rate increase premiums.

6. Marketing Method

These policies were sold directly to employer groups, through benefit consultants, or non-captive agents.

7. Underwriting Description

Actively-at-work employees were guaranteed issue during open enrollment periods; otherwise they were subject to short-form underwriting.

Generally, spouses of actively-at-work employees were subject to short-form underwriting. However, in some cases with older forms (P1-43636-A and SR-LTCP-Series), spouses were allowed to enter subject to a simple ADL screen, conditional upon the actively-at-work employee also enrolling. This practice was generally phased out in the late 1990's.

All other eligible classes of insureds, such as parents and retirees, were subject to long-form underwriting.

Various underwriting tools in addition to the application may have included medical records, an attending physician's statement, telephone interviews, and/or face-to-face assessments.

The distribution of the inforce certificates by underwriting type at original issue is provided below:

Underwriting Type	Inforce at Dec. 31, 2018
Guaranteed Issue	84%
Short-Form	14%
Long-Form	2%

8. Premiums

Premiums are unisex and payable for life unless the insured selected a limited pay option. Less than 0.5% of insureds inforce as of December 31, 2018 elected a limited pay option. Premiums are level except for a limited number of groups where premiums may increase annually, indexed to a 5% annual benefit inflation rate. Premiums may vary by issue age, elimination period, benefit period / lifetime maximum, initial daily benefit amount, and level of home health care coverage, ABI option, premium mode, underwriting class, marital status, group size, and the selection of any other options or riders.

9. Modal Premium Factors

The following modal factors remain unchanged and are applied to the annual premium to obtain the modal premium.

Payment Mode	P1-43636-A and SR-LTCP-Series	GLTC-3-P-xx-01	Nationwide Premium Distribution at Dec. 31, 2018
Annual	1.000	1.00000	17.1%
Semi-Annual	0.520	0.51000	8.8%
Quarterly	0.270	0.26100	37.1%
Monthly	0.090	0.08700	32.0%
Semi-Monthly	0.045	0.04350	1.6%
Bi-Weekly	0.090*(12/26)	0.04015	3.2%
Weekly	0.090*(12/52)	0.02008	0.2%

10. Issue Age Range

Issue ages range from 17 to 90.

11. Area Factors

Area factors are not used for these policy forms.

12. Average Annualized Premium

The average annualized premium for the policy forms subject to the rate increase request, both before and after the impact of the requested rate increase, is included in Exhibit 1.

13. Number of Insureds

The current number of insureds as of December 31, 2018 can be found in Exhibit 1.

14. Distribution of Business

The historical experience reflects the actual distribution of insureds during the experience period. The current distribution of business as of December 31, 2018 was used to project future experience. Exhibit 2 contains the distribution of the inforce insureds by key demographic and benefit characteristics.

15. Claim Liability and Reserves

Active life reserves have not been used in this rate increase analysis. Claim reserves as of December 31, 2018 have been discounted to the incurral date of each respective claim and included in historical incurred claims. Incurred but not reported reserve ("IBNR") balances and terminated but not reported reserve ("TBNR") balances as of December 31, 2018 have been allocated to a calendar year of incurral and included in historical incurred claims.

16. Trend Assumptions

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

17. Experience – Past and Future

Earned premiums and incurred claims, projected through 2078 are developed from a first-principles actuarial model representing actual contracts in-force as of December 31, 2018. The assumptions described in Section 5 are used to project earned premiums and incurred claims.

Waived premiums are not included as premiums nor claims in either the actual historical or the projected future experience.

Historical results reflect earned premium by calendar year with claims captured by incurral year. That is, incurred claims for a calendar year represent all payments through December 31, 2018 for a claim incurred in a particular calendar year plus any claim reserve held as of December 31, 2018. Incurred claims also include IBNR and TBNR held as of December 31, 2018.

Exhibit 3 presents nationwide experience, restated with your state's prior rate increase approvals, for all forms affected by this rate increase to ensure maximum credibility. Although we believe Pennsylvania only data is not credible on its own, we are including Pennsylvania specific experience through December 31, 2018 for reference in Exhibit 4.

Annual loss ratios are calculated, with and without interest, as incurred claims divided by earned premiums.

A lifetime loss ratio as of December 31, 2018 is calculated as the sum of accumulated past experience and discounted future experience using the nationwide inforce count-weighted average maximum statutory valuation interest rate for contract reserves.

18. History of Rate Adjustments

See Exhibit 1 for a history of prior rate adjustments in your state.

19. Ensuring No Cross-Subsidization Between States

We have ensured no state's rate increase approvals will subsidize other states' experience. Rate increase requests will vary by state, but only to reflect the timing and amount of prior rate increases approved by that state. This is accomplished by first backing-out all prior rate increases from our nationwide premium data. We then reintroduce prior rate increases with the amount and timing based on your state's prior approvals (as referenced in Section 17). The current proposed rate increase(s) are then determined.

Although some states may have capped our previous inforce rate increase filings, it is the intention of CCC's management that subsequent filings will be submitted at a later date until an actuarially equivalent amount is achieved.

20. Requested Rate Increase and Demonstration of Satisfaction of Requirements

CCC is requesting a premium rate increase on all policy forms included in this filing. The rate increase request varies by benefit feature, specifically the lifetime ABI benefit, as follows:

Benefit Feature	Requested Rate Increase
Insureds without Standard Lifetime ABI	19.1%
Insureds with Standard Lifetime ABI	69.9%
Weighted Average Total (Based on Pennsylvania's Premium Distribution)	28.5%

Corresponding rate schedules reflecting the increase are included with this filing. CCC will continue to monitor the experience of this block and take appropriate actions when necessary.

Upon approval of this rate revision, CCC will communicate to certificate holders their options to reduce the impact of the rate increase. When insureds are notified of the rate increase, they will be encouraged to call our customer service staff and discuss these options if they so desire. Available options will depend upon the insured's current coverage levels, benefit options available under their group plan, and any statutory minimum benefit levels in your state.

Although many insureds have contractual non-forfeiture benefits, the Company is making a non-forfeiture option available for all insureds in conjunction with this rate increase. This option provides a paid-up policy with benefits equal to the total of premiums paid, less any claims paid since the original policy was issued.

Note that the actual rates implemented may vary slightly from those filed due to implementation rounding algorithms.

Satisfaction of minimum required loss ratio requirements is demonstrated in Exhibit 1. This approach shows that with the requested rate increase, the expected lifetime loss ratio exceeds the minimum loss ratio requirement.

Exhibit 4 included with this memorandum provides a demonstration that the requested rate increase meets the {58/85} test required by your state's rate stability regulation.

The historical and future projected incurred claims in the 58/85 test were increased by 10% from the best estimate projections to reflect assumptions that include moderately adverse conditions (equates to a 10%

deterioration in the lifetime loss ratio). Present and accumulated values in the demonstration are determined at the average maximum valuation interest rate for contract reserves over the issue period.

This memo certifies that these rates with the full rate increase will be sufficient under moderately adverse conditions. Moderately adverse is defined as a 10% deterioration in the lifetime loss ratio (i.e. Lifetime Loss Ratio x 1.1).

21. Proposed Effective Date

The rate increase will apply to certificates on their next premium due date following a notification period at least as long as required by your state following approval. No insured will receive more than one increase in a 12 month period.

22. Relationship of Renewal Premium to New Business Premium

CCC is no longer selling any new long term care business. Therefore, the comparison of renewal premium rates after the rate increase to the Company's current new business premium rate schedule is not applicable.

23. Actuarial Certification

I am an Associate of the Society of Actuaries and a Member of the American Academy of Actuaries. I meet the Academy's qualification standards to render this actuarial opinion and am familiar with the filing requirements for long term care insurance premium and rate increases.

This memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice ("ASOP"), including, but not limited to, the following:

- ASOP 7, "Analysis of Life, Health, or Property/Casualty Insurer Cash Flows";
- ASOP 8, "Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health Benefits";
- ASOP 18, "Long Term Care Insurance";
- ASOP 23, "Data Quality"; and
- ASOP 41, "Actuarial Communications".

I have relied upon policy and claim information extracts, as of December 31, 2018, which contain a seriatim listing of all insureds covered under CCC Long Term Care insurance contracts. I have also relied upon associated paid premium extracts providing details of payment dates and amounts. I have also relied upon associated paid claim extracts providing details by claim regarding payment dates, service dates, benefit types and payment amounts. This information was provided by CCC's Long Term Care Operations team in partnership with our Third Party Administrator.

I have relied upon statutory reserves as of December 31, 2018, for Claims Reserves, Incurred but Not Reported reserves, and Terminated but Not Reported Reserves, provided by CCC's Long Term Care Finance and Reserving team.

I have relied upon actuarial assumptions developed by CCC's Long Term Care Projections and Experience Studies team, which develops assumptions primarily for asset and reserve adequacy analysis, under the direction of the opining actuary, Philip Sanchez, FSA, MAAA, who approved those assumptions in collaboration with other CCC Long Term Care actuaries, including Inforce Management actuaries. These assumptions present the actuary's best judgement, as of December 31, 2018. We have reviewed these assumptions for reasonableness and consistency for use in this filing.

I have reviewed and considered the policy design and benefits, as well as the company's underwriting and claims adjudication processes, when developing the filed rates.

I hereby certify that, to the best of my knowledge and judgement, this rate filing is in compliance with the applicable laws and regulations of your state. In my opinion, the actuarial assumptions are appropriate and the rates are neither excessive nor unfairly discriminatory.

Once the revised premium rate schedule is implemented and the underlying assumptions, which reflect moderately adverse conditions, are realized, no further premium rate schedule increases are anticipated.



Louis Scarim, ASA, MAAA
Actuarial Consulting Director, LTC Inforce Management
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February 4, 2020

Date

24. Exhibit Listing

- Exhibit 1: State Specific Information
- Exhibit 2: Distribution of Inforce Insureds
- Exhibit 3: Nationwide Experience and Projections
- Exhibit 4: Pennsylvania Specific Experience and Projections
- Exhibit 5: Nationwide 58/85 Test

Exhibit 1a
 Continental Casualty Company
 Pennsylvania
 Policy Forms with Automatic Standard Lifetime Inflation Protection

12) Average Annualized Premium as of December 31, 2018

	Nationwide	Pennsylvania
Without Increase	\$1,744	\$2,177
With Increase	\$2,963	\$3,699

13) Insured Count and Premium as of December 31, 2018

Insureds Eligible for Rate Increase

	Nationwide	Pennsylvania
Insureds Not on Claim	20,174	120
Insureds on Claim	307	1
Total Insureds	20,481	121
2018 Annualized Premium	\$35,712,962	\$263,432

Insureds Not Eligible for Rate Increase

	Nationwide	Pennsylvania
Non-Forfeiture Insureds Not on Claim	0	0
Non-Forfeiture Insureds on Claim	0	0
Paid-Up Limited Pay Insureds Not on Claim	60	0
Paid-Up Limited Pay Insureds on Claim	2	0
Total Non-Forfeiture and Paid-Up Insureds	62	0

18) History of Rate Adjustments

SERFF Number	Approval Date	Rate Increase Approved
CNAB-130153872	1/12/2016	44%*
CNAB-131580664	9/26/2018	20.0%

*implemented over two years

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	115%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

Exhibit 1b
 Continental Casualty Company
 Pennsylvania
 Policy Forms without Automatic Standard Lifetime Inflation Protection

12) Average Annualized Premium as of December 31, 2018

	Nationwide	Pennsylvania
Without Increase	\$1,178	\$1,540
With Increase	\$1,403	\$1,834

13) Insured Count and Premium as of December 31, 2018

Insureds Eligible for Rate Increase

	Nationwide	Pennsylvania
Insureds Not on Claim	135,609	3,062
Insureds on Claim	1,940	41
Total Insureds	137,549	3,103
2018 Annualized Premium	\$162,039,018	\$4,778,491

Insureds Not Eligible for Rate Increase

	Nationwide	Pennsylvania
Non-Forfeiture Insureds Not on Claim	79,486	847
Non-Forfeiture Insureds on Claim	45	3
Paid-Up Limited Pay Insureds Not on Claim	407	30
Paid-Up Limited Pay Insureds on Claim	16	2
Total Non-Forfeiture and Paid-Up Insureds	79,954	882

18) History of Rate Adjustments

SERFF Number	Approval Date	Rate Increase Approved
CNAB-130153872	1/12/2016	44%*
CNAB-131580664	9/26/2018	20.0%

*implemented over two years

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	68%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

Exhibit 1c
 Continental Casualty Company
 Pennsylvania
 All Policy Forms

12) Average Annualized Premium as of December 31, 2018

	Nationwide	Pennsylvania
Without Increase	\$1,251	\$1,564
With Increase	\$1,609	\$2,010

13) Insured Count and Premium as of December 31, 2018

Insureds Eligible for Rate Increase

	Nationwide	Pennsylvania
Insureds Not on Claim	155,783	3,182
Insureds on Claim	2,247	42
Total Insureds	158,030	3,224
2018 Annualized Premium	\$197,751,980	\$5,041,923

Insureds Not Eligible for Rate Increase

	Nationwide	Pennsylvania
Non-Forfeiture Insureds Not on Claim	79,486	847
Non-Forfeiture Insureds on Claim	45	3
Paid-Up Limited Pay Insureds Not on Claim	467	30
Paid-Up Limited Pay Insureds on Claim	18	2
Total Non-Forfeiture and Paid-Up Insureds	80,016	882

18) History of Rate Adjustments

SERFF Number	Approval Date	Rate Increase Approved
CNAB-130153872	1/12/2016	44%*
CNAB-131580664	9/26/2018	20.0%

*implemented over two years

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	77%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

Exhibit 2a
Continental Casualty Company
Pennsylvania
Distribution of Inforce Eligible for Rate Increase
Policy Forms with Automatic Standard Lifetime Inflation Protection

	Nationwide				Pennsylvania			
	Count	% of Count	Premium	% of Premium	Count	% of Count	Premium	% of Premium
Issue Year	1987-1991	93	0%	\$160,762	0%	0	\$0	0%
	1992-1996	1,289	6%	\$1,804,139	5%	0	\$0	0%
	1997-2001	6,851	33%	\$10,795,400	30%	12	\$16,018	6%
	2002-2006	6,750	33%	\$10,821,795	30%	72	\$155,372	59%
	2007-2011	3,432	17%	\$7,267,718	20%	32	\$77,028	29%
	2012-2016	2,066	10%	\$4,863,148	14%	5	\$15,014	6%
	Total	20,481	100%	\$35,712,962	100%	121	\$263,432	100%
Issue Age	<35	1,382	7%	\$928,836	3%	4	\$2,712	1%
	35-39	1,686	8%	\$1,525,408	4%	8	\$7,088	3%
	40-44	2,735	13%	\$3,100,206	9%	11	\$10,958	4%
	45-49	4,112	20%	\$5,734,795	16%	15	\$22,543	9%
	50-54	4,900	24%	\$8,765,722	25%	44	\$103,541	39%
	55-59	3,659	18%	\$8,703,521	24%	26	\$71,212	27%
	60-64	1,502	7%	\$4,814,390	13%	11	\$36,122	14%
	65-69	412	2%	\$1,610,382	5%	2	\$9,255	4%
	70+	93	0%	\$529,703	1%	0	\$0	0%
Total	20,481	100%	\$35,712,962	100%	121	\$263,432	100%	
Attained Age	<45	679	3%	\$527,729	1%	4	\$2,712	1%
	45-49	913	4%	\$841,026	2%	5	\$5,057	2%
	50-54	1,646	8%	\$1,832,848	5%	7	\$7,111	3%
	55-59	2,754	13%	\$3,701,335	10%	9	\$14,392	5%
	60-64	4,006	20%	\$6,398,213	18%	19	\$43,039	16%
	65-69	4,520	22%	\$8,168,342	23%	29	\$59,043	22%
	70-74	3,612	18%	\$7,625,381	21%	35	\$93,225	35%
	75-79	1,671	8%	\$4,284,281	12%	12	\$33,426	13%
	80+	680	3%	\$2,333,808	7%	1	\$5,429	2%
Total	20,481	100%	\$35,712,962	100%	121	\$263,432	100%	
Gender	Male	8,433	41%	\$15,332,279	43%	44	\$90,294	34%
	Female	12,048	59%	\$20,380,683	57%	77	\$173,138	66%
	Total	20,481	100%	\$35,712,962	100%	121	\$263,432	100%
Inflation Type	None*	0	0%	\$0	0%	0	\$0	0%
	Simple	315	2%	\$331,948	1%	0	\$0	0%
	Compound	20,166	98%	\$35,381,014	99%	121	\$263,432	100%
	Total	20,481	100%	\$35,712,962	100%	121	\$263,432	100%
Elimination Period	30-Day	619	3%	\$937,325	3%	0	\$0	0%
	60-Day	5,524	27%	\$8,860,270	25%	0	\$0	0%
	90-Day	13,897	68%	\$25,282,518	71%	121	\$263,432	100%
	100-Day	441	2%	\$632,849	2%	0	\$0	0%
	Total	20,481	100%	\$35,712,962	100%	121	\$263,432	100%
Maximum Benefit Period	< 1,500 days	6,843	33%	\$9,320,415	26%	61	\$99,748	38%
	1,500 - 2,000 days	12,729	62%	\$24,482,627	69%	51	\$127,959	49%
	> 2,000 days	779	4%	\$1,719,518	5%	7	\$30,434	12%
	Unlimited	130	1%	\$190,402	1%	2	\$5,292	2%
	Total	20,481	100%	\$35,712,962	100%	121	\$263,432	100%
Home Health Care Reimbursement Level	0	157	1%	\$126,273	0%	0	\$0	0%
	50%	4,341	21%	\$7,655,501	21%	12	\$14,415	5%
	60%	7,222	35%	\$12,697,634	36%	72	\$184,507	70%
	75%	6,540	32%	\$11,200,370	31%	37	\$64,511	24%
	100%	1,263	6%	\$2,327,873	7%	0	\$0	0%
	Other	958	5%	\$1,705,310	5%	0	\$0	0%
Total	20,481	100%	\$35,712,962	100%	121	\$263,432	100%	

*Includes Insureds with Automatic Purchase Options at Current Attained Age

Exhibit 2b
Continental Casualty Company
Pennsylvania
Distribution of Inforce Eligible for Rate Increase
Policy Forms without Automatic Standard Lifetime Inflation Protection

	Nationwide				Pennsylvania				
	Count	% of Count	Premium	% of Premium	Count	% of Count	Premium	% of Premium	
Issue Year	1987-1991	5,710	4%	\$6,227,306	4%	0	0%	\$0	0%
	1992-1996	16,368	12%	\$18,256,883	11%	99	3%	\$83,078	2%
	1997-2001	38,960	28%	\$44,587,306	28%	1,372	44%	\$1,987,960	42%
	2002-2006	37,006	27%	\$42,672,775	26%	555	18%	\$852,949	18%
	2007-2011	24,802	18%	\$31,145,864	19%	878	28%	\$1,540,603	32%
	2012-2016	14,703	11%	\$19,148,884	12%	199	6%	\$313,901	7%
	Total	137,549	100%	\$162,039,018	100%	3,103	100%	\$4,778,491	100%
Issue Age	<35	10,964	8%	\$4,375,179	3%	104	3%	\$44,995	1%
	35-39	12,897	9%	\$7,635,897	5%	173	6%	\$104,753	2%
	40-44	18,712	14%	\$14,172,109	9%	295	10%	\$249,426	5%
	45-49	25,284	18%	\$24,296,247	15%	462	15%	\$441,476	9%
	50-54	30,263	22%	\$37,017,328	23%	741	24%	\$1,005,246	21%
	55-59	23,747	17%	\$38,136,713	24%	702	23%	\$1,237,018	26%
	60-64	11,420	8%	\$23,658,926	15%	442	14%	\$1,084,384	23%
	65-69	3,447	3%	\$9,420,095	6%	153	5%	\$481,335	10%
	70+	815	1%	\$3,326,523	2%	31	1%	\$129,858	3%
	Total	137,549	100%	\$162,039,018	100%	3,103	100%	\$4,778,491	100%
Attained Age	<45	4,726	3%	\$1,705,430	1%	58	2%	\$24,626	1%
	45-49	6,305	5%	\$3,144,701	2%	49	2%	\$26,041	1%
	50-54	10,764	8%	\$6,826,242	4%	137	4%	\$92,694	2%
	55-59	18,090	13%	\$14,519,249	9%	300	10%	\$268,173	6%
	60-64	24,923	18%	\$25,585,072	16%	550	18%	\$627,209	13%
	65-69	27,551	20%	\$33,916,341	21%	729	23%	\$1,055,536	22%
	70-74	23,467	17%	\$34,123,579	21%	664	21%	\$1,198,028	25%
	75-79	13,313	10%	\$23,077,855	14%	384	12%	\$817,911	17%
	80+	8,410	6%	\$19,140,548	12%	232	7%	\$668,271	14%
Total	137,549	100%	\$162,039,018	100%	3,103	100%	\$4,778,491	100%	
Gender	Male	59,354	43%	\$72,892,401	45%	1,427	46%	\$2,238,320	47%
	Female	78,195	57%	\$89,146,617	55%	1,676	54%	\$2,540,170	53%
	Total	137,549	100%	\$162,039,018	100%	3,103	100%	\$4,778,491	100%
Inflation Type	None*	134,616	98%	\$155,821,684	96%	3,103	100%	\$4,778,491	100%
	Simple	664	0%	\$642,850	0%	0	0%	\$0	0%
	Compound	2,269	2%	\$5,574,484	3%	0	0%	\$0	0%
	Total	137,549	100%	\$162,039,018	100%	3,103	100%	\$4,778,491	100%
Elimination Period	30-Day	2,941	2%	\$3,295,994	2%	0	0%	\$0	0%
	60-Day	22,560	16%	\$25,545,687	16%	0	0%	\$0	0%
	90-Day	111,489	81%	\$132,549,503	82%	3,103	100%	\$4,778,491	100%
	100-Day	559	0%	\$647,834	0%	0	0%	\$0	0%
	Total	137,549	100%	\$162,039,018	100%	3,103	100%	\$4,778,491	100%
Maximum Benefit Period	< 1,500 days	29,068	21%	\$27,311,943	17%	373	12%	\$442,267	9%
	1,500 - 2,000 days	96,127	70%	\$118,435,957	73%	2,670	86%	\$4,207,086	88%
	> 2,000 days	11,555	8%	\$15,461,468	10%	60	2%	\$129,137	3%
	Unlimited	799	1%	\$829,650	1%	0	0%	\$0	0%
	Total	137,549	100%	\$162,039,018	100%	3,103	100%	\$4,778,491	100%
Home Health Care %	0	825	1%	\$788,514	0%	0	0%	\$0	0%
	50%	39,691	29%	\$46,276,742	29%	1,893	61%	\$3,079,965	64%
	60%	60,803	44%	\$69,482,704	43%	1,057	34%	\$1,466,803	31%
	75%	29,513	21%	\$36,640,075	23%	50	2%	\$77,982	2%
	100%	4,029	3%	\$4,820,755	3%	103	3%	\$153,741	3%
	Other	2,688	2%	\$4,030,228	2%	0	0%	\$0	0%
Total	137,549	100%	\$162,039,018	100%	3,103	100%	\$4,778,491	100%	

*Includes Insureds with Automatic Purchase Options at Current Attained Age

Exhibit 2c
Continental Casualty Company
Pennsylvania
Distribution of Inforce Eligible for Rate Increase
All Policy Forms

	Nationwide				Pennsylvania				
	Count	% of Count	Premium	% of Premium	Count	% of Count	Premium	% of Premium	
Issue Year	1987-1991	5,803	4%	\$6,388,068	3%	0	0%	\$0	0%
	1992-1996	17,657	11%	\$20,061,022	10%	99	3%	\$83,078	2%
	1997-2001	45,811	29%	\$55,382,706	28%	1,384	43%	\$2,003,977	40%
	2002-2006	43,756	28%	\$53,494,570	27%	627	19%	\$1,008,321	20%
	2007-2011	28,234	18%	\$38,413,582	19%	910	28%	\$1,617,631	32%
	2012-2016	16,769	11%	\$24,012,032	12%	204	6%	\$328,915	7%
	Total	158,030	100%	\$197,751,980	100%	3,224	100%	\$5,041,923	100%
Issue Age	<35	12,346	8%	\$5,304,015	3%	108	3%	\$47,707	1%
	35-39	14,583	9%	\$9,161,305	5%	181	6%	\$111,842	2%
	40-44	21,447	14%	\$17,272,315	9%	306	9%	\$260,384	5%
	45-49	29,396	19%	\$30,031,042	15%	477	15%	\$464,020	9%
	50-54	35,163	22%	\$45,783,050	23%	785	24%	\$1,108,786	22%
	55-59	27,406	17%	\$46,840,233	24%	728	23%	\$1,308,229	26%
	60-64	12,922	8%	\$28,473,317	14%	453	14%	\$1,120,506	22%
	65-69	3,859	2%	\$11,030,477	6%	155	5%	\$490,590	10%
	70+	908	1%	\$3,856,226	2%	31	1%	\$129,858	3%
	Total	158,030	100%	\$197,751,980	100%	3,224	100%	\$5,041,923	100%
Attained Age	<45	5,405	3%	\$2,233,159	1%	62	2%	\$27,339	1%
	45-49	7,218	5%	\$3,985,728	2%	54	2%	\$31,098	1%
	50-54	12,410	8%	\$8,659,090	4%	144	4%	\$99,805	2%
	55-59	20,844	13%	\$18,220,584	9%	309	10%	\$282,564	6%
	60-64	28,929	18%	\$31,983,284	16%	569	18%	\$670,248	13%
	65-69	32,071	20%	\$42,084,683	21%	758	24%	\$1,114,579	22%
	70-74	27,079	17%	\$41,748,960	21%	699	22%	\$1,291,252	26%
	75-79	14,984	9%	\$27,362,136	14%	396	12%	\$851,337	17%
	80+	9,090	6%	\$21,474,356	11%	233	7%	\$673,700	13%
Total	158,030	100%	\$197,751,980	100%	3,224	100%	\$5,041,923	100%	
Gender	Male	67,787	43%	\$88,224,680	45%	1,471	46%	\$2,328,614	46%
	Female	90,243	57%	\$109,527,300	55%	1,753	54%	\$2,713,309	54%
	Total	158,030	100%	\$197,751,980	100%	3,224	100%	\$5,041,923	100%
Inflation Type	None*	134,616	85%	\$155,821,684	79%	3,103	96%	\$4,778,491	95%
	Simple	979	1%	\$974,798	0%	0	0%	\$0	0%
	Compound	22,435	14%	\$40,955,498	21%	121	4%	\$263,432	5%
	Total	158,030	100%	\$197,751,980	100%	3,224	100%	\$5,041,923	100%
Elimination Period	30-Day	3,560	2%	\$4,233,319	2%	0	0%	\$0	0%
	60-Day	28,084	18%	\$34,405,956	17%	0	0%	\$0	0%
	90-Day	125,386	79%	\$157,832,021	80%	3,224	100%	\$5,041,923	100%
	100-Day	1,000	1%	\$1,280,683	1%	0	0%	\$0	0%
	Total	158,030	100%	\$197,751,980	100%	3,224	100%	\$5,041,923	100%
Maximum Benefit Period	< 1,500 days	35,911	23%	\$36,632,358	19%	434	13%	\$542,015	11%
	1,500 - 2,000 days	108,856	69%	\$142,918,583	72%	2,721	84%	\$4,335,044	86%
	> 2,000 days	12,334	8%	\$17,180,986	9%	67	2%	\$159,571	3%
	Unlimited	929	1%	\$1,020,052	1%	2	0%	\$5,292	0%
	Total	158,030	100%	\$197,751,980	100%	3,224	100%	\$5,041,923	100%
Home Health Care %	0	982	1%	\$914,788	0%	0	0%	\$0	0%
	50%	44,032	28%	\$53,932,243	27%	1,905	59%	\$3,094,379	61%
	60%	68,025	43%	\$82,180,338	42%	1,129	35%	\$1,651,309	33%
	75%	36,053	23%	\$47,840,444	24%	87	3%	\$142,493	3%
	100%	5,292	3%	\$7,148,628	4%	103	3%	\$153,741	3%
	Other	3,646	2%	\$5,735,538	3%	0	0%	\$0	0%
Total	158,030	100%	\$197,751,980	100%	3,224	100%	\$5,041,923	100%	

**Includes Insureds with Automatic Purchase Options at Current Attained Age

Exhibit 3a
Continental Casualty Company
Group Long Term Care - Insureds with Standard Lifetime ABI
Nationwide Historical and Projected Experience Restated to Pennsylvania Rate Levels

Calendar Year	Without Rate Increase				With 69.9% Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1989	4,443	-	0%	0%	4,443	-	0%	0%
1990	15,827	-	0%	0%	15,827	-	0%	0%
1991	66,686	-	0%	0%	66,686	-	0%	0%
1992	92,159	-	0%	0%	92,159	-	0%	0%
1993	148,048	5,672	4%	2%	148,048	5,672	4%	2%
1994	1,080,302	-	0%	0%	1,080,302	-	0%	0%
1995	1,526,751	-	0%	0%	1,526,751	-	0%	0%
1996	1,519,697	32,742	2%	1%	1,519,697	32,742	2%	1%
1997	2,060,996	126,312	6%	3%	2,060,996	126,312	6%	3%
1998	2,264,835	146,745	6%	4%	2,264,835	146,745	6%	4%
1999	3,870,409	373,664	10%	5%	3,870,409	373,664	10%	5%
2000	6,364,600	1,285,059	20%	10%	6,364,600	1,285,059	20%	10%
2001	11,885,072	2,191,167	18%	13%	11,885,072	2,191,167	18%	13%
2002	14,987,040	2,619,226	17%	15%	14,987,040	2,619,226	17%	15%
2003	19,107,847	5,222,257	27%	18%	19,107,847	5,222,257	27%	18%
2004	20,135,677	3,161,738	16%	18%	20,135,677	3,161,738	16%	18%
2005	20,226,086	1,871,989	9%	16%	20,226,086	1,871,989	9%	16%
2006	21,235,151	3,635,193	17%	16%	21,235,151	3,635,193	17%	16%
2007	21,909,130	5,001,176	23%	17%	21,909,130	5,001,176	23%	17%
2008	23,057,762	4,727,424	21%	18%	23,057,762	4,727,424	21%	18%
2009	23,990,254	4,531,138	19%	18%	23,990,254	4,531,138	19%	18%
2010	24,471,391	4,976,564	20%	18%	24,471,391	4,976,564	20%	18%
2011	25,609,891	4,398,703	17%	18%	25,609,891	4,398,703	17%	18%
2012	26,431,059	7,904,446	30%	19%	26,431,059	7,904,446	30%	19%
2013	27,140,944	7,812,766	29%	20%	27,140,944	7,812,766	29%	20%
2014	27,243,231	12,438,151	46%	22%	27,243,231	12,438,151	46%	22%
2015	27,502,169	12,142,869	44%	24%	27,502,169	12,142,869	44%	24%
2016	29,720,120	18,506,480	62%	27%	29,720,120	18,506,480	62%	27%
2017	33,200,361	16,809,063	51%	29%	33,200,361	16,809,063	51%	29%
2018	36,072,637	19,187,839	53%	31%	36,072,637	19,187,839	53%	31%
Total Actual	452,940,573	139,108,385	31%	31%	452,940,573	139,108,385	31%	31%
Projected								
2019	41,422,701	18,670,183	45%	32%	41,422,701	18,926,898	46%	32%
2020	40,190,324	20,725,133	52%	33%	47,698,555	20,447,056	43%	33%
2021	38,975,121	23,397,168	60%	35%	57,425,957	21,183,203	37%	33%
2022	37,777,133	25,259,076	67%	37%	55,660,841	22,595,129	41%	34%
2023	36,578,126	28,766,607	79%	40%	53,894,224	25,288,399	47%	35%
2024	35,382,781	32,964,084	93%	42%	52,133,003	28,844,361	55%	36%
2025	34,170,573	37,598,977	110%	46%	50,346,936	32,726,791	65%	38%
2026	32,932,028	43,017,920	131%	49%	48,522,062	37,303,642	77%	40%
2027	31,665,559	49,024,912	155%	54%	46,656,046	42,512,697	91%	43%
2028	30,369,635	55,601,901	183%	58%	44,746,632	48,216,033	108%	46%
2029	29,045,779	62,652,764	216%	64%	42,796,062	54,330,295	127%	49%
2030	27,694,947	70,066,070	253%	70%	40,805,745	60,758,857	149%	53%
2031	26,322,362	77,787,933	296%	76%	38,783,378	67,454,987	174%	58%
2032	24,931,333	85,767,809	344%	84%	36,733,835	74,374,858	202%	62%
2033	23,526,193	93,821,739	399%	92%	34,663,502	81,358,946	235%	68%
2034	22,112,836	101,727,014	460%	100%	32,581,060	88,214,125	271%	73%
2035	20,698,082	109,351,968	528%	109%	30,496,562	94,826,220	311%	79%
2036	19,290,677	116,546,306	604%	118%	28,422,890	101,064,899	356%	86%
2037	17,897,910	123,044,758	687%	128%	26,370,787	106,700,131	405%	92%
2038	16,527,089	128,694,396	779%	139%	24,351,019	111,599,300	458%	99%
2039	15,187,712	133,423,080	878%	149%	22,377,580	115,699,850	517%	106%
2040	13,888,595	137,223,596	988%	160%	20,463,461	118,995,525	582%	114%
2041	12,637,495	139,973,518	1108%	171%	18,620,089	121,380,162	652%	121%
2042	11,440,802	141,643,382	1238%	183%	16,856,882	122,828,210	729%	129%
2043	10,304,709	142,175,407	1380%	194%	15,182,962	123,289,563	812%	136%
2044	9,234,521	141,524,939	1533%	205%	13,606,147	122,725,501	902%	144%
2045	8,233,798	139,872,683	1699%	216%	12,131,681	121,292,721	1000%	151%
2046	7,304,390	137,227,974	1879%	227%	10,762,290	118,999,322	1106%	158%
2047	6,447,415	133,724,850	2074%	237%	9,499,624	115,961,534	1221%	165%
2048	5,662,964	129,496,728	2287%	247%	8,343,813	112,295,055	1346%	172%
2049	4,949,839	124,586,508	2517%	257%	7,293,095	108,037,083	1481%	179%
2050	4,305,767	119,210,492	2769%	266%	6,344,119	103,375,188	1629%	185%
2051	3,727,690	113,346,389	3041%	275%	5,492,380	98,290,042	1790%	191%
2052	3,212,245	107,201,463	3337%	284%	4,732,923	92,961,377	1964%	197%
2053	2,755,549	100,896,696	3662%	292%	4,060,027	87,494,103	2155%	202%
2054	2,353,184	94,334,488	4009%	299%	3,467,183	81,803,584	2359%	207%
2055	2,000,746	87,646,750	4381%	306%	2,947,900	76,004,210	2578%	212%
2056	1,693,870	81,037,363	4784%	313%	2,495,749	70,272,780	2816%	217%
2057	1,428,090	74,561,608	5221%	319%	2,104,149	64,657,231	3073%	221%
2058	1,198,934	68,416,949	5706%	324%	1,766,509	59,328,797	3359%	224%
2059	1,002,342	62,448,418	6230%	330%	1,476,851	54,153,094	3667%	228%
2060	834,452	56,679,338	6792%	334%	1,229,482	49,150,349	3998%	231%
2061	691,760	51,071,569	7383%	338%	1,019,239	44,287,487	4345%	234%
2062	571,163	45,694,853	8000%	342%	841,552	39,624,985	4709%	236%
2063	469,688	40,701,023	8666%	345%	692,039	35,294,510	5100%	239%
2064	384,646	36,079,753	9380%	348%	566,737	31,287,106	5521%	241%
2065	313,688	31,820,837	10144%	351%	462,188	27,593,922	5970%	243%
2066	254,702	27,973,850	10983%	353%	375,277	24,257,949	6464%	244%
2067	205,854	24,370,616	11839%	355%	303,305	21,133,350	6968%	245%
2068	165,601	21,054,843	12714%	357%	243,996	18,258,027	7483%	247%
2069	132,585	18,011,232	13585%	359%	195,350	15,618,714	7995%	248%
2070	105,664	15,341,408	14519%	360%	155,685	13,303,535	8545%	249%
2071	83,773	13,025,819	15549%	361%	123,432	11,295,537	9151%	249%
2072	66,039	10,968,284	16609%	362%	97,302	9,511,314	9775%	250%
2073	51,757	9,144,319	17668%	363%	76,259	7,929,635	10398%	250%
2074	40,306	7,574,641	18793%	363%	59,386	6,568,465	11061%	251%
2075	31,168	6,211,127	19928%	364%	45,923	5,386,073	11728%	251%
2076	23,925	5,048,030	21099%	364%	35,251	4,377,476	12418%	252%
2077	18,223	4,053,274	22242%	364%	26,850	3,514,858	13091%	252%
2078	13,773	3,212,374	23323%	365%	20,294	2,785,659	13727%	252%
Total Projected	720,940,613	4,142,497,187	575%	365%	1,031,106,760	3,599,750,709	349%	252%
Total Lifetime	1,173,881,186	4,281,605,571	365%	365%	1,484,047,333	3,738,859,094	252%	252%
Values Accumulated/Discounted to 12/31/18 at Maximum Statutory Valuation Interest Rates								
Past	664,908,551	171,305,910	26%	26%	664,908,551	171,305,910	26%	26%
Future	463,659,126	1,537,922,319	332%	332%	653,154,077	1,340,613,713	205%	205%
Lifetime	1,128,567,677	1,709,228,229	151%	151%	1,318,062,627	1,511,919,622	115%	115%

Exhibit 3b
Continental Casualty Company
Group Long Term Care - Insureds without Standard Lifetime ABI
Nationwide Historical and Projected Experience Restated to Pennsylvania Rate Levels

Calendar Year	Without Rate Increase				With 19.1% Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1989	390,844	-	0%	0%	390,844	-	0%	0%
1990	2,160,948	178,746	8%	7%	2,160,948	178,746	8%	7%
1991	6,408,877	572,130	9%	8%	6,408,877	572,130	9%	8%
1992	8,571,545	1,872,001	22%	15%	8,571,545	1,872,001	22%	15%
1993	13,767,798	1,478,988	11%	13%	13,767,798	1,478,988	11%	13%
1994	16,653,498	1,331,780	8%	11%	16,653,498	1,331,780	8%	11%
1995	18,198,433	2,506,404	14%	12%	18,198,433	2,506,404	14%	12%
1996	20,022,854	6,401,639	32%	17%	20,022,854	6,401,639	32%	17%
1997	34,693,787	4,796,309	14%	16%	34,693,787	4,796,309	14%	16%
1998	29,661,559	5,669,398	19%	16%	29,661,559	5,669,398	19%	16%
1999	36,065,235	10,088,150	28%	19%	36,065,235	10,088,150	28%	19%
2000	46,304,529	8,535,954	18%	19%	46,304,529	8,535,954	18%	19%
2001	62,504,977	9,810,453	16%	18%	62,504,977	9,810,453	16%	18%
2002	76,486,333	12,474,241	16%	18%	76,486,333	12,474,241	16%	18%
2003	87,458,810	15,480,256	18%	18%	87,458,810	15,480,256	18%	18%
2004	92,687,310	16,972,234	18%	18%	92,687,310	16,972,234	18%	18%
2005	93,804,283	22,324,156	24%	19%	93,804,283	22,324,156	24%	19%
2006	96,618,806	40,435,214	42%	22%	96,618,806	40,435,214	42%	22%
2007	99,871,796	28,980,472	29%	23%	99,871,796	28,980,472	29%	23%
2008	108,674,335	21,410,852	20%	22%	108,674,335	21,410,852	20%	22%
2009	111,841,714	28,065,458	25%	23%	111,841,714	28,065,458	25%	23%
2010	122,708,329	28,507,937	23%	23%	122,708,329	28,507,937	23%	23%
2011	125,420,263	31,973,448	25%	23%	125,420,263	31,973,448	25%	23%
2012	129,560,962	38,865,164	30%	24%	129,560,962	38,865,164	30%	24%
2013	138,568,829	42,501,761	31%	24%	138,568,829	42,501,761	31%	24%
2014	140,525,311	47,664,944	34%	25%	140,525,311	47,664,944	34%	25%
2015	141,819,944	57,337,916	40%	26%	141,819,944	57,337,916	40%	26%
2016	146,501,337	71,194,844	49%	28%	146,501,337	71,194,844	49%	28%
2017	157,543,991	61,507,025	39%	29%	157,543,991	61,507,025	39%	29%
2018	160,357,928	80,566,379	50%	30%	160,357,928	80,566,379	50%	30%
Total Actual	2,325,855,164	699,504,254	30%	30%	2,325,855,164	699,504,254	30%	30%
Projected								
2019	181,642,969	84,621,336	47%	31%	181,642,969	85,784,880	47%	31%
2020	174,609,724	89,808,329	51%	33%	183,996,181	91,792,159	50%	33%
2021	167,776,868	96,630,060	58%	34%	192,822,389	97,378,206	51%	34%
2022	161,144,706	99,137,288	62%	36%	185,200,185	98,708,739	53%	35%
2023	154,657,701	107,061,374	69%	37%	177,744,809	104,757,881	59%	36%
2024	148,246,514	116,178,569	78%	39%	170,376,568	113,153,271	66%	38%
2025	141,861,200	125,237,292	88%	41%	163,038,062	121,333,926	74%	39%
2026	135,459,494	135,461,467	100%	43%	155,680,718	130,749,127	84%	41%
2027	129,047,159	145,981,395	113%	46%	148,311,158	140,903,094	95%	43%
2028	122,636,416	156,779,254	128%	48%	140,943,427	151,325,325	107%	46%
2029	116,220,479	167,497,015	144%	51%	133,569,727	161,670,244	121%	48%
2030	109,824,149	177,974,988	162%	54%	126,218,561	171,783,716	136%	51%
2031	103,460,281	187,998,107	182%	57%	118,904,702	181,458,158	153%	53%
2032	97,136,273	197,511,550	203%	61%	111,636,654	190,640,654	171%	56%
2033	90,878,964	206,146,512	227%	64%	104,445,262	198,975,228	191%	59%
2034	84,708,488	213,565,665	252%	68%	97,353,664	206,136,289	212%	62%
2035	78,645,082	219,793,623	279%	71%	90,385,121	212,147,593	235%	66%
2036	72,714,107	224,697,391	309%	75%	83,568,777	216,880,772	260%	69%
2037	66,935,454	228,102,400	341%	79%	76,927,495	220,167,330	286%	72%
2038	61,334,337	229,639,366	374%	83%	70,490,250	221,650,830	314%	76%
2039	55,938,484	229,312,708	410%	87%	64,288,911	221,335,535	344%	79%
2040	50,774,977	227,439,274	448%	90%	58,354,602	219,527,273	376%	82%
2041	45,866,830	224,116,737	489%	94%	52,713,773	216,320,318	410%	86%
2042	41,228,953	219,354,252	532%	98%	47,383,560	211,723,507	447%	89%
2043	36,874,892	213,114,541	578%	101%	42,379,530	205,700,859	485%	92%
2044	32,815,297	205,468,610	626%	105%	37,713,923	198,320,909	526%	95%
2045	29,056,699	196,791,405	677%	108%	33,394,246	189,945,561	569%	98%
2046	25,599,848	187,194,346	731%	111%	29,421,361	180,682,358	614%	101%
2047	22,441,116	176,879,502	788%	114%	25,791,098	170,726,339	662%	104%
2048	19,573,376	166,025,446	848%	117%	22,495,265	160,249,867	712%	106%
2049	16,987,191	154,832,404	911%	120%	19,523,018	149,446,201	765%	109%
2050	14,670,108	143,576,505	979%	122%	16,860,044	138,581,865	822%	111%
2051	12,606,802	132,368,477	1050%	124%	14,488,730	127,763,733	882%	113%
2052	10,780,641	121,277,809	1125%	127%	12,389,962	117,058,880	945%	115%
2053	9,174,367	110,492,876	1204%	129%	10,543,905	106,649,126	1011%	116%
2054	7,770,207	100,016,837	1287%	130%	8,930,134	96,537,520	1081%	118%
2055	6,550,166	90,064,898	1375%	132%	7,527,967	86,931,782	1155%	119%
2056	5,495,953	80,701,295	1468%	133%	6,316,383	77,893,914	1233%	121%
2057	4,590,035	71,990,888	1568%	135%	5,275,230	69,486,325	1317%	122%
2058	3,815,427	63,895,692	1675%	136%	4,384,989	61,672,933	1406%	123%
2059	3,156,406	56,366,508	1786%	137%	3,627,590	54,405,669	1500%	124%
2060	2,598,695	49,449,429	1903%	138%	2,986,625	47,729,217	1598%	124%
2061	2,129,037	43,118,786	2025%	138%	2,446,857	41,618,799	1701%	125%
2062	1,735,510	37,385,595	2154%	139%	1,994,584	36,085,051	1809%	126%
2063	1,407,491	32,243,422	2291%	140%	1,617,599	31,121,760	1924%	126%
2064	1,135,415	27,693,825	2439%	140%	1,304,908	26,730,431	2048%	127%
2065	910,760	23,648,666	2597%	141%	1,046,717	22,825,993	2181%	127%
2066	726,302	20,032,877	2758%	141%	834,723	19,335,987	2316%	127%
2067	575,730	16,843,345	2926%	141%	661,675	16,257,410	2457%	128%
2068	453,538	14,045,790	3097%	141%	521,242	13,557,175	2601%	128%
2069	355,012	11,619,713	3273%	142%	408,008	11,215,494	2749%	128%
2070	276,048	9,528,849	3452%	142%	317,256	9,197,366	2899%	128%
2071	213,161	7,749,668	3636%	142%	244,981	7,480,078	3053%	128%
2072	163,394	6,241,096	3820%	142%	187,785	6,023,985	3208%	128%
2073	124,292	4,982,160	4008%	142%	142,846	4,808,844	3366%	128%
2074	93,775	3,937,854	4199%	142%	107,774	3,800,867	3527%	129%
2075	70,131	3,085,213	4399%	142%	80,600	2,977,887	3695%	129%
2076	51,963	2,386,646	4593%	142%	59,720	2,303,621	3857%	129%
2077	38,136	1,817,755	4766%	142%	43,829	1,754,520	4003%	129%
2078	27,726	1,363,150	4916%	142%	31,865	1,315,729	4129%	129%
Total Projected	2,867,794,260	6,698,277,632	234%	142%	3,252,100,495	6,484,498,112	199%	129%
Total Lifetime	5,193,649,424	7,397,781,885	142%	142%	5,577,955,659	7,184,002,365	129%	129%
Values Accumulated/Discounted to 12/31/18 at Maximum Statutory Valuation Interest Rates								
Past	3,571,322,280	960,507,947	27%	27%	3,571,322,280	960,507,947	27%	27%
Future	1,889,065,092	3,023,414,166	160%	160%	2,128,871,367	2,935,667,652	138%	138%
Lifetime	5,460,387,372	3,983,922,113	73%	73%	5,700,193,647	3,896,175,599	68%	68%

Exhibit 3c
Continental Casualty Company
Group Long Term Care - All Policy forms
Nationwide Historical and Projected Experience Restated to Pennsylvania Rate Levels

Calendar Year	Without Rate Increase				With Proposed Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1989	395,287	-	0%	0%	395,287	-	0%	0%
1990	2,176,775	178,746	8%	7%	2,176,775	178,746	8%	7%
1991	6,475,563	572,130	9%	8%	6,475,563	572,130	9%	8%
1992	8,663,704	1,872,001	22%	15%	8,663,704	1,872,001	22%	15%
1993	13,915,846	1,484,660	11%	13%	13,915,846	1,484,660	11%	13%
1994	17,733,800	1,331,780	8%	11%	17,733,800	1,331,780	8%	11%
1995	19,725,184	2,506,404	13%	12%	19,725,184	2,506,404	13%	12%
1996	21,542,551	6,434,381	30%	16%	21,542,551	6,434,381	30%	16%
1997	36,754,783	4,922,620	13%	15%	36,754,783	4,922,620	13%	15%
1998	31,926,394	5,816,143	18%	16%	31,926,394	5,816,143	18%	16%
1999	39,935,643	10,461,815	26%	18%	39,935,643	10,461,815	26%	18%
2000	52,669,129	9,821,013	19%	18%	52,669,129	9,821,013	19%	18%
2001	74,390,049	12,001,620	16%	18%	74,390,049	12,001,620	16%	18%
2002	91,473,373	15,093,467	17%	17%	91,473,373	15,093,467	17%	17%
2003	106,566,656	20,702,513	19%	18%	106,566,656	20,702,513	19%	18%
2004	112,822,987	20,133,972	18%	18%	112,822,987	20,133,972	18%	18%
2005	114,030,369	24,196,145	21%	18%	114,030,369	24,196,145	21%	18%
2006	117,853,956	44,070,407	37%	21%	117,853,956	44,070,407	37%	21%
2007	121,780,926	33,981,648	28%	22%	121,780,926	33,981,648	28%	22%
2008	131,732,098	26,138,276	20%	22%	131,732,098	26,138,276	20%	22%
2009	135,831,968	32,596,596	24%	22%	135,831,968	32,596,596	24%	22%
2010	147,179,720	33,484,500	23%	22%	147,179,720	33,484,500	23%	22%
2011	151,030,153	36,372,151	24%	22%	151,030,153	36,372,151	24%	22%
2012	155,992,021	46,769,610	30%	23%	155,992,021	46,769,610	30%	23%
2013	165,709,773	50,314,528	30%	23%	165,709,773	50,314,528	30%	23%
2014	167,768,543	60,103,095	36%	25%	167,768,543	60,103,095	36%	25%
2015	169,322,114	69,480,785	41%	26%	169,322,114	69,480,785	41%	26%
2016	176,221,457	89,701,324	51%	28%	176,221,457	89,701,324	51%	28%
2017	190,744,352	78,316,088	41%	29%	190,744,352	78,316,088	41%	29%
2018	196,430,565	99,754,219	51%	30%	196,430,565	99,754,219	51%	30%
Total Actual	2,778,795,738	838,612,638	30%	30%	2,778,795,738	838,612,638	30%	30%
Projected								
2019	223,065,671	103,291,519	46%	31%	223,065,671	104,711,777	47%	31%
2020	214,800,048	110,533,462	51%	33%	231,694,736	112,239,215	48%	33%
2021	206,751,989	120,027,228	58%	34%	250,248,346	118,561,409	47%	34%
2022	198,921,838	124,396,364	63%	36%	240,861,027	121,303,868	50%	35%
2023	191,235,827	135,827,981	71%	38%	231,639,033	130,046,280	56%	36%
2024	183,629,295	149,142,654	81%	40%	222,509,571	141,997,632	64%	38%
2025	176,031,774	162,636,269	93%	42%	213,384,998	154,060,717	72%	39%
2026	168,391,522	178,479,387	106%	44%	204,202,779	168,052,769	82%	41%
2027	160,712,718	195,006,307	121%	47%	194,967,203	183,415,791	94%	43%
2028	153,006,052	212,381,155	139%	50%	185,690,059	199,541,358	107%	46%
2029	145,266,258	230,149,779	158%	53%	176,365,788	216,000,540	122%	48%
2030	137,519,096	248,041,058	180%	57%	167,024,305	232,542,573	139%	51%
2031	129,782,643	265,786,040	205%	61%	157,688,080	248,913,145	158%	54%
2032	122,067,605	283,279,359	232%	65%	148,370,489	265,015,512	179%	57%
2033	114,405,157	299,968,250	262%	69%	139,108,764	280,334,174	202%	61%
2034	106,821,323	315,292,679	295%	73%	129,934,725	294,350,415	227%	65%
2035	99,343,164	329,145,591	331%	78%	120,881,683	306,973,813	254%	68%
2036	92,004,783	341,243,697	371%	83%	111,991,667	317,945,672	284%	72%
2037	84,833,364	351,147,158	414%	88%	103,298,282	326,867,461	316%	76%
2038	77,861,426	358,333,762	460%	93%	94,841,269	333,250,129	351%	81%
2039	71,126,196	362,735,787	510%	98%	86,666,491	337,035,385	389%	85%
2040	64,663,572	364,662,870	564%	103%	78,818,063	338,522,798	429%	89%
2041	58,504,325	364,090,255	622%	108%	71,333,862	337,700,480	473%	93%
2042	52,669,755	360,997,634	685%	113%	64,240,441	334,551,717	521%	97%
2043	47,179,601	355,289,948	753%	118%	57,562,491	328,990,422	572%	101%
2044	42,049,818	346,993,550	825%	123%	51,320,070	311,046,410	626%	105%
2045	37,290,496	336,664,087	903%	128%	45,525,927	311,238,282	684%	109%
2046	32,904,237	324,422,320	986%	132%	40,183,651	299,681,680	746%	113%
2047	28,888,531	310,604,351	1075%	137%	35,290,722	286,687,874	812%	117%
2048	25,236,340	295,522,174	1171%	141%	30,839,078	272,544,921	884%	120%
2049	21,937,030	279,418,912	1274%	145%	26,816,113	257,483,284	960%	123%
2050	18,975,876	262,786,997	1385%	149%	23,204,163	241,957,053	1043%	126%
2051	16,334,492	245,714,866	1504%	152%	19,981,110	226,053,776	1131%	129%
2052	13,992,886	228,479,272	1633%	155%	17,122,885	210,020,257	1227%	132%
2053	11,929,916	211,389,572	1772%	159%	14,603,933	194,143,228	1329%	134%
2054	10,123,391	194,351,325	1920%	161%	12,397,316	178,341,104	1439%	137%
2055	8,550,912	177,711,647	2078%	164%	10,475,867	162,935,992	1555%	139%
2056	7,189,824	161,738,659	2250%	166%	8,812,131	148,166,695	1681%	141%
2057	6,018,125	146,552,296	2435%	168%	7,379,378	134,143,556	1818%	142%
2058	5,014,360	132,312,642	2639%	170%	6,151,498	121,001,729	1967%	144%
2059	4,158,748	118,814,926	2857%	172%	5,104,441	108,558,763	2127%	146%
2060	3,433,147	106,128,767	3091%	174%	4,216,107	96,879,565	2298%	147%
2061	2,820,797	94,190,355	3339%	175%	3,466,096	85,906,286	2478%	148%
2062	2,306,673	83,080,448	3602%	176%	2,836,136	75,710,036	2669%	149%
2063	1,877,179	72,944,445	3886%	178%	2,309,638	66,416,270	2876%	150%
2064	1,520,061	63,773,578	4195%	178%	1,871,645	58,017,537	3100%	151%
2065	1,224,448	55,469,504	4530%	179%	1,508,906	50,419,915	3341%	151%
2066	981,004	48,006,727	4894%	180%	1,210,001	43,593,936	3603%	152%
2067	781,584	41,213,961	5273%	181%	964,980	37,390,760	3875%	152%
2068	619,139	35,100,632	5669%	181%	765,238	31,815,201	4158%	153%
2069	487,597	29,630,945	6077%	182%	603,358	26,834,208	4447%	153%
2070	381,712	24,870,257	6515%	182%	472,941	22,500,901	4758%	154%
2071	296,934	20,775,488	6997%	182%	368,413	18,775,615	5096%	154%
2072	229,433	17,209,380	7501%	183%	285,088	15,535,299	5449%	154%
2073	176,049	14,126,479	8024%	183%	219,105	12,738,479	5814%	154%
2074	134,081	11,512,495	8586%	183%	167,161	10,369,332	6203%	154%
2075	101,299	9,296,340	9177%	183%	126,524	8,363,960	6611%	154%
2076	75,888	7,434,676	9797%	183%	94,971	6,681,097	7035%	155%
2077	56,360	5,871,029	10417%	183%	70,679	5,269,378	7455%	155%
2078	41,499	4,575,524	11025%	183%	52,159	4,101,389	7863%	155%
Total Projected	3,588,734,872	10,840,774,818	302%	183%	4,283,207,255	10,084,248,821	235%	155%
Total Lifetime	6,367,530,610	11,679,387,457	183%	183%	7,062,002,992	10,922,861,459	155%	155%
Values Accumulated/Discounted to 12/31/18 at Maximum Statutory Valuation Interest Rates								
Past	4,236,230,831	1,131,813,857	27%	27%	4,236,230,831	1,131,813,857	27%	27%
Future	2,352,724,218	4,561,336,485	194%	194%	2,782,025,443	4,276,281,364	154%	154%
Lifetime	6,588,955,049	5,693,150,342	86%	86%	7,018,256,274	5,408,095,221	77%	77.06%

Exhibit 4a
Continental Casualty Company
Group Long Term Care - Insureds with Standard Lifetime ABI
Pennsylvania Historical and Projected Experience

Calendar Year	Without Rate Increase				With 69.9% Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	-	-	0%	0%	-	-	0%	0%
1995	-	-	0%	0%	-	-	0%	0%
1996	-	-	0%	0%	-	-	0%	0%
1997	-	-	0%	0%	-	-	0%	0%
1998	7,848	-	0%	0%	7,848	-	0%	0%
1999	15,338	-	0%	0%	15,338	-	0%	0%
2000	12,983	-	0%	0%	12,983	-	0%	0%
2001	12,721	-	0%	0%	12,721	-	0%	0%
2002	107,124	-	0%	0%	107,124	-	0%	0%
2003	134,578	-	0%	0%	134,578	-	0%	0%
2004	131,330	-	0%	0%	131,330	-	0%	0%
2005	141,715	-	0%	0%	141,715	-	0%	0%
2006	146,843	-	0%	0%	146,843	-	0%	0%
2007	156,100	-	0%	0%	156,100	-	0%	0%
2008	167,204	5,365	3%	1%	167,204	5,365	3%	1%
2009	228,004	-	0%	0%	228,004	-	0%	0%
2010	228,855	-	0%	0%	228,855	-	0%	0%
2011	221,057	-	0%	0%	221,057	-	0%	0%
2012	221,184	70,500	32%	4%	221,184	70,500	32%	4%
2013	213,656	19,912	9%	4%	213,656	19,912	9%	4%
2014	212,275	11,470	5%	5%	212,275	11,470	5%	5%
2015	215,138	-	0%	4%	215,138	-	0%	4%
2016	219,419	16,632	8%	4%	219,419	16,632	8%	4%
2017	227,894	132,093	58%	8%	227,894	132,093	58%	8%
2018	249,852	-	0%	8%	249,852	-	0%	8%
Total Actual	3,271,117	255,972	8%	8%	3,271,117	255,972	8%	8%
Projected								
2019	295,936	99,283	34%	10%	295,936	100,648	34%	10%
2020	288,053	117,781	41%	12%	341,867	116,201	34%	12%
2021	280,008	143,453	51%	15%	412,565	129,879	31%	14%
2022	271,945	163,548	60%	18%	400,683	146,300	37%	16%
2023	263,851	194,997	74%	21%	388,758	171,420	44%	18%
2024	255,611	231,990	91%	25%	376,618	202,997	54%	20%
2025	247,079	275,124	111%	29%	364,047	239,473	66%	23%
2026	238,108	324,632	136%	33%	350,829	281,510	80%	27%
2027	228,702	379,055	166%	39%	336,970	328,703	98%	30%
2028	218,908	437,327	200%	45%	322,540	379,235	118%	34%
2029	208,781	499,816	239%	51%	307,618	433,423	141%	39%
2030	198,296	565,769	285%	59%	292,170	490,615	168%	44%
2031	187,432	628,113	335%	67%	276,163	544,678	197%	49%
2032	176,254	694,403	394%	76%	259,692	602,162	232%	55%
2033	164,829	756,301	459%	85%	242,860	655,838	270%	62%
2034	153,256	815,766	532%	95%	225,808	707,404	313%	68%
2035	141,609	859,949	607%	105%	208,646	745,718	357%	75%
2036	130,034	892,303	686%	115%	191,593	773,774	404%	82%
2037	118,664	915,219	771%	126%	174,839	793,646	454%	90%
2038	107,607	929,431	864%	137%	158,549	805,970	508%	97%
2039	96,927	935,447	965%	147%	142,813	811,187	568%	104%
2040	86,725	925,898	1068%	158%	127,781	802,907	628%	111%
2041	77,135	902,733	1170%	168%	113,651	782,819	689%	118%
2042	68,203	871,391	1278%	178%	100,491	755,640	752%	125%
2043	59,953	836,874	1396%	187%	88,335	725,708	822%	131%
2044	52,423	790,558	1508%	196%	77,240	685,544	888%	137%
2045	45,630	741,332	1625%	204%	67,232	642,857	956%	142%
2046	39,545	686,412	1736%	212%	58,266	595,233	1022%	147%
2047	34,168	637,095	1865%	219%	50,344	552,467	1097%	152%
2048	29,434	590,338	2006%	225%	43,368	511,921	1180%	157%
2049	25,275	547,790	2167%	231%	37,240	475,024	1276%	161%
2050	21,646	512,113	2366%	237%	31,893	444,087	1392%	165%
2051	18,500	478,627	2587%	242%	27,258	415,049	1523%	168%
2052	15,783	448,091	2839%	247%	23,254	388,569	1671%	172%
2053	13,448	425,391	3163%	252%	19,815	368,884	1862%	175%
2054	11,442	404,874	3539%	257%	16,858	351,092	2083%	178%
2055	9,720	385,372	3965%	261%	14,321	334,181	2333%	181%
2056	8,241	365,975	4441%	266%	12,143	317,361	2614%	184%
2057	6,975	346,918	4974%	270%	10,277	300,835	2927%	187%
2058	5,891	330,466	5610%	273%	8,680	286,569	3302%	189%
2059	4,961	313,514	6320%	277%	7,309	271,869	3720%	192%
2060	4,163	297,026	7135%	281%	6,134	257,571	4199%	194%
2061	3,479	275,718	7924%	284%	5,127	239,093	4664%	197%
2062	2,895	253,058	8742%	287%	4,265	219,443	5145%	199%
2063	2,397	232,869	9717%	290%	3,531	201,935	5719%	200%
2064	1,974	215,401	10909%	292%	2,909	186,788	6421%	202%
2065	1,614	199,890	12381%	294%	2,379	173,338	7287%	204%
2066	1,310	185,540	14162%	297%	1,930	160,894	8335%	205%
2067	1,056	168,151	15920%	299%	1,556	145,815	9370%	207%
2068	846	151,473	17907%	301%	1,246	131,352	10539%	208%
2069	673	134,127	19925%	302%	992	116,310	11727%	209%
2070	533	117,232	22003%	304%	785	101,660	12950%	210%
2071	418	103,201	24667%	305%	616	89,492	14518%	211%
2072	326	87,262	26762%	306%	480	75,670	15751%	212%
2073	252	72,030	28567%	307%	372	62,462	16813%	212%
2074	193	59,158	30596%	307%	285	51,300	18007%	213%
2075	147	48,043	32755%	308%	216	41,661	19278%	213%
2076	110	40,279	36728%	308%	162	34,929	21616%	214%
2077	80	32,451	40334%	309%	119	28,140	23739%	214%
2078	58	25,056	43251%	309%	85	21,728	25455%	214%
Total Projected	4,929,518	25,099,440	509%	309%	7,040,507	21,808,979	310%	214%
Total Lifetime	8,200,635	25,355,412	309%	309%	10,311,624	22,064,952	214%	214%
Values Accumulated/Discounted to 12/31/18 at Maximum Statutory Valuation Interest Rates								
Past	4,632,862	294,656	6%	6%	4,632,862	294,656	6%	6%
Future	3,248,109	9,954,612	306%	306%	4,571,177	8,672,560	190%	190%
Lifetime	7,880,971	10,249,269	130%	130%	9,204,039	8,967,216	97%	97%

Exhibit 4b
Continental Casualty Company
Group Long Term Care - Insureds without Standard Lifetime ABI
Pennsylvania Historical and Projected Experience

Calendar Year	Without Rate Increase				With 19.1% Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	5,269	-	0%	0%	5,269	-	0%	0%
1994	5,526	-	0%	0%	5,526	-	0%	0%
1995	5,545	-	0%	0%	5,545	-	0%	0%
1996	5,802	-	0%	0%	5,802	-	0%	0%
1997	133,346	-	0%	0%	133,346	-	0%	0%
1998	150,690	-	0%	0%	150,690	-	0%	0%
1999	551,836	-	0%	0%	551,836	-	0%	0%
2000	1,062,923	267,422	25%	14%	1,062,923	267,422	25%	14%
2001	2,019,011	98,761	5%	9%	2,019,011	98,761	5%	9%
2002	1,917,370	155,800	8%	9%	1,917,370	155,800	8%	9%
2003	2,059,220	115,877	6%	8%	2,059,220	115,877	6%	8%
2004	2,081,168	586,242	28%	12%	2,081,168	586,242	28%	12%
2005	2,131,872	357,950	17%	13%	2,131,872	357,950	17%	13%
2006	2,211,708	202,887	9%	12%	2,211,708	202,887	9%	12%
2007	2,422,928	1,083,696	45%	17%	2,422,928	1,083,696	45%	17%
2008	2,512,698	506,167	20%	18%	2,512,698	506,167	20%	18%
2009	3,180,310	921,572	29%	19%	3,180,310	921,572	29%	19%
2010	4,075,972	540,941	13%	18%	4,075,972	540,941	13%	18%
2011	4,041,367	923,911	23%	19%	4,041,367	923,911	23%	19%
2012	4,071,127	403,160	10%	18%	4,071,127	403,160	10%	18%
2013	4,205,870	580,212	14%	17%	4,205,870	580,212	14%	17%
2014	4,233,018	976,249	23%	18%	4,233,018	976,249	23%	18%
2015	4,245,179	1,078,726	25%	19%	4,245,179	1,078,726	25%	19%
2016	4,184,731	1,111,577	27%	19%	4,184,731	1,111,577	27%	19%
2017	4,027,631	769,112	19%	19%	4,027,631	769,112	19%	19%
2018	4,545,060	2,034,575	45%	21%	4,545,060	2,034,575	45%	21%
Total Actual	60,087,177	12,714,836	21%	21%	60,087,177	12,714,836	21%	21%
Projected								
2019	5,366,979	2,383,756	44%	23%	5,366,979	2,416,533	45%	23%
2020	5,145,059	2,555,896	50%	25%	5,421,641	2,612,354	48%	25%
2021	4,926,432	2,787,440	57%	27%	5,661,844	2,809,021	50%	27%
2022	4,714,312	2,881,837	61%	29%	5,418,059	2,869,380	53%	29%
2023	4,500,926	3,136,356	70%	31%	5,172,819	3,068,875	59%	30%
2024	4,286,747	3,401,376	79%	34%	4,926,667	3,312,804	67%	32%
2025	4,074,549	3,659,691	90%	36%	4,682,792	3,545,626	76%	34%
2026	3,860,750	3,945,850	102%	39%	4,437,078	3,808,584	86%	37%
2027	3,645,572	4,228,530	116%	41%	4,189,778	4,081,431	97%	39%
2028	3,431,798	4,506,816	131%	44%	3,944,092	4,350,036	110%	42%
2029	3,219,753	4,768,028	148%	48%	3,700,394	4,602,161	124%	44%
2030	3,009,826	5,010,401	166%	51%	3,459,129	4,836,102	140%	47%
2031	2,802,671	5,241,465	187%	54%	3,221,050	5,059,128	157%	50%
2032	2,598,375	5,450,072	210%	58%	2,986,257	5,260,479	176%	53%
2033	2,397,480	5,614,245	234%	61%	2,755,373	5,418,941	197%	56%
2034	2,200,952	5,737,083	261%	65%	2,529,508	5,537,506	219%	60%
2035	2,010,024	5,807,176	289%	69%	2,310,078	5,605,160	243%	63%
2036	1,825,890	5,834,271	320%	72%	2,098,456	5,631,312	268%	66%
2037	1,649,178	5,815,761	353%	76%	1,895,365	5,613,446	296%	69%
2038	1,480,481	5,737,795	388%	80%	1,701,486	5,538,192	325%	73%
2039	1,321,027	5,603,897	424%	83%	1,518,228	5,408,953	356%	76%
2040	1,171,520	5,428,610	463%	87%	1,346,403	5,239,763	389%	79%
2041	1,032,459	5,214,514	505%	90%	1,186,583	5,033,115	424%	82%
2042	904,156	4,968,399	550%	93%	1,039,127	4,795,561	461%	84%
2043	786,721	4,691,770	596%	96%	904,161	4,528,556	501%	87%
2044	680,157	4,386,223	645%	99%	781,690	4,233,638	542%	89%
2045	584,299	4,070,099	697%	101%	671,523	3,928,511	585%	92%
2046	498,818	3,738,731	750%	104%	573,281	3,608,670	629%	94%
2047	423,238	3,407,611	805%	106%	486,418	3,289,069	676%	96%
2048	356,899	3,076,846	862%	108%	410,177	2,969,811	724%	98%
2049	299,168	2,757,232	922%	110%	343,827	2,661,315	774%	99%
2050	249,288	2,451,994	984%	111%	286,502	2,366,695	826%	101%
2051	206,518	2,165,973	1049%	113%	237,347	2,090,624	881%	102%
2052	170,128	1,897,771	1115%	114%	195,525	1,831,753	937%	103%
2053	139,421	1,649,750	1183%	115%	160,234	1,592,360	994%	104%
2054	113,674	1,421,527	1251%	116%	130,644	1,372,075	1050%	105%
2055	92,246	1,217,134	1319%	117%	106,017	1,174,793	1108%	106%
2056	74,555	1,037,886	1392%	118%	85,684	1,001,781	1169%	106%
2057	60,059	879,786	1465%	118%	69,025	849,181	1230%	107%
2058	48,248	744,363	1543%	119%	55,451	718,469	1296%	107%
2059	38,663	628,903	1627%	119%	44,435	607,025	1366%	108%
2060	30,929	529,001	1710%	120%	35,546	510,599	1436%	108%
2061	24,718	443,707	1795%	120%	28,408	428,272	1508%	108%
2062	19,747	372,708	1887%	120%	22,694	359,742	1585%	109%
2063	15,777	314,384	1993%	120%	18,132	303,448	1674%	109%
2064	12,605	267,435	2122%	120%	14,487	258,132	1782%	109%
2065	10,064	228,234	2268%	121%	11,566	220,294	1905%	109%
2066	8,026	193,412	2410%	121%	9,224	186,684	2024%	109%
2067	6,389	162,466	2543%	121%	7,343	156,814	2135%	109%
2068	5,075	135,179	2663%	121%	5,833	130,476	2237%	109%
2069	4,020	113,443	2822%	121%	4,621	109,497	2370%	109%
2070	3,168	96,016	3031%	121%	3,641	92,676	2546%	110%
2071	2,476	79,653	3216%	121%	2,846	76,882	2701%	110%
2072	1,919	64,972	3387%	121%	2,205	62,712	2844%	110%
2073	1,473	51,466	3493%	121%	1,693	49,676	2933%	110%
2074	1,123	40,703	3624%	121%	1,291	39,287	3044%	110%
2075	848	32,148	3789%	121%	975	31,030	3182%	110%
2076	634	25,062	3951%	121%	729	24,190	3319%	110%
2077	468	19,090	4077%	121%	538	18,426	3424%	110%
2078	342	14,135	4137%	121%	393	13,644	3475%	110%
Total Projected	76,548,820	153,126,079	200%	121%	86,683,290	148,351,273	171%	110%
Total Lifetime	136,635,997	165,840,914	121%	121%	146,770,467	161,066,109	110%	110%
Values Accumulated/Discounted to 12/31/18 at Maximum Statutory Valuation Interest Rates								
Past	86,274,292	16,537,963	19%	19%	86,274,292	16,537,963	19%	19%
Future	52,310,642	75,916,514	145%	145%	58,874,153	73,775,390	125%	125%
Lifetime	138,584,934	92,454,477	67%	67%	145,148,445	90,313,353	62%	62%

Exhibit 4c
Continental Casualty Company
Group Long Term Care - All Policy forms
Pennsylvania Historical and Projected Experience

Calendar Year	Without Rate Increase				With Proposed Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	5,269	-	0%	0%	5,269	-	0%	0%
1994	5,526	-	0%	0%	5,526	-	0%	0%
1995	5,545	-	0%	0%	5,545	-	0%	0%
1996	5,802	-	0%	0%	5,802	-	0%	0%
1997	133,346	-	0%	0%	133,346	-	0%	0%
1998	158,538	-	0%	0%	158,538	-	0%	0%
1999	567,173	-	0%	0%	567,173	-	0%	0%
2000	1,075,906	267,422	25%	14%	1,075,906	267,422	25%	14%
2001	2,031,732	98,761	5%	9%	2,031,732	98,761	5%	9%
2002	2,024,493	155,800	8%	9%	2,024,493	155,800	8%	9%
2003	2,193,798	115,877	5%	8%	2,193,798	115,877	5%	8%
2004	2,212,498	586,242	26%	12%	2,212,498	586,242	26%	12%
2005	2,273,587	357,950	16%	12%	2,273,587	357,950	16%	12%
2006	2,358,550	202,887	9%	12%	2,358,550	202,887	9%	12%
2007	2,579,029	1,083,696	42%	16%	2,579,029	1,083,696	42%	16%
2008	2,679,902	511,532	19%	17%	2,679,902	511,532	19%	17%
2009	3,408,314	921,572	27%	18%	3,408,314	921,572	27%	18%
2010	4,304,827	540,941	13%	17%	4,304,827	540,941	13%	17%
2011	4,262,425	923,911	22%	18%	4,262,425	923,911	22%	18%
2012	4,292,311	473,660	11%	17%	4,292,311	473,660	11%	17%
2013	4,419,526	600,124	14%	17%	4,419,526	600,124	14%	17%
2014	4,445,293	987,719	22%	17%	4,445,293	987,719	22%	17%
2015	4,460,317	1,078,726	24%	18%	4,460,317	1,078,726	24%	18%
2016	4,404,150	1,128,209	26%	18%	4,404,150	1,128,209	26%	18%
2017	4,255,525	901,205	21%	19%	4,255,525	901,205	21%	19%
2018	4,794,912	2,034,575	42%	20%	4,794,912	2,034,575	42%	20%
Total Actual	63,358,294	12,970,808	20%	20%	63,358,294	12,970,808	20%	20%
Projected								
2019	5,662,915	2,483,040	44%	22%	5,662,915	2,517,181	44%	22%
2020	5,433,113	2,673,677	49%	24%	5,763,508	2,728,555	47%	24%
2021	5,206,441	2,930,893	56%	26%	6,074,408	2,938,900	48%	26%
2022	4,986,257	3,045,385	61%	28%	5,818,742	3,015,679	52%	28%
2023	4,764,777	3,331,354	70%	31%	5,561,576	3,240,296	58%	30%
2024	4,542,358	3,633,365	80%	33%	5,303,285	3,515,800	66%	32%
2025	4,321,628	3,934,815	91%	36%	5,046,839	3,785,099	75%	34%
2026	4,098,859	4,270,482	104%	38%	4,787,907	4,090,094	85%	36%
2027	3,874,274	4,607,585	119%	41%	4,526,748	4,410,134	97%	39%
2028	3,650,706	4,944,143	135%	44%	4,266,632	4,729,271	111%	41%
2029	3,428,534	5,267,845	154%	48%	4,008,012	5,035,585	126%	44%
2030	3,208,122	5,576,170	174%	51%	3,751,299	5,326,717	142%	47%
2031	2,990,103	5,869,578	196%	55%	3,497,213	5,603,806	160%	50%
2032	2,774,629	6,144,475	221%	59%	3,245,950	5,862,641	181%	53%
2033	2,562,309	6,370,546	249%	63%	2,998,232	6,074,779	203%	57%
2034	2,354,209	6,552,849	278%	67%	2,755,316	6,244,910	227%	60%
2035	2,151,632	6,667,125	310%	71%	2,518,724	6,350,878	252%	64%
2036	1,955,924	6,726,574	344%	75%	2,290,049	6,405,086	280%	67%
2037	1,767,842	6,730,979	381%	79%	2,070,205	6,407,092	309%	71%
2038	1,588,089	6,667,226	420%	83%	1,860,035	6,344,163	341%	74%
2039	1,417,954	6,539,345	461%	87%	1,661,040	6,220,140	374%	78%
2040	1,258,245	6,354,509	505%	90%	1,474,183	6,042,670	410%	81%
2041	1,109,594	6,117,248	551%	94%	1,300,234	5,815,934	447%	84%
2042	972,359	5,839,790	601%	98%	1,139,618	5,551,201	487%	87%
2043	846,674	5,528,644	653%	101%	992,496	5,254,264	529%	90%
2044	732,580	5,176,781	707%	104%	858,930	4,919,183	573%	93%
2045	629,930	4,811,431	764%	107%	738,755	4,571,368	619%	95%
2046	538,363	4,425,143	822%	110%	631,546	4,203,903	666%	98%
2047	457,406	4,044,706	884%	112%	536,762	3,841,536	716%	100%
2048	386,334	3,667,184	949%	115%	453,545	3,481,732	768%	102%
2049	324,443	3,305,021	1019%	117%	381,067	3,136,339	823%	103%
2050	270,934	2,964,107	1094%	118%	318,395	2,810,782	883%	105%
2051	225,019	2,644,600	1175%	120%	264,605	2,505,674	947%	106%
2052	185,911	2,345,863	1262%	122%	218,779	2,220,322	1015%	108%
2053	152,869	2,075,142	1357%	123%	180,048	1,961,245	1089%	109%
2054	125,116	1,826,400	1460%	124%	147,502	1,723,168	1168%	110%
2055	101,966	1,602,506	1572%	125%	120,338	1,508,974	1254%	111%
2056	82,796	1,403,861	1696%	126%	97,827	1,319,142	1348%	111%
2057	67,035	1,226,704	1830%	127%	79,302	1,150,016	1450%	112%
2058	54,139	1,074,829	1985%	127%	64,131	1,005,038	1567%	113%
2059	43,624	942,417	2160%	128%	51,744	878,894	1699%	113%
2060	35,092	826,027	2354%	129%	41,680	768,169	1843%	114%
2061	28,197	719,426	2551%	129%	33,534	667,365	1990%	114%
2062	22,641	625,765	2764%	130%	26,960	579,185	2148%	114%
2063	18,174	547,253	3011%	130%	21,663	505,383	2333%	115%
2064	14,580	482,836	3312%	130%	17,396	444,920	2558%	115%
2065	11,678	428,124	3666%	130%	13,945	393,632	2823%	115%
2066	9,336	378,952	4059%	131%	11,154	347,577	3116%	116%
2067	7,446	330,617	4440%	131%	8,899	302,629	3401%	116%
2068	5,921	286,652	4841%	131%	7,079	261,829	3699%	116%
2069	4,694	247,570	5275%	131%	5,612	225,807	4023%	116%
2070	3,701	213,248	5763%	131%	4,426	194,335	4391%	116%
2071	2,895	182,854	6317%	132%	3,463	166,374	4805%	116%
2072	2,245	152,234	6782%	132%	2,685	138,382	5153%	116%
2073	1,726	123,496	7157%	132%	2,065	112,137	5431%	116%
2074	1,317	99,861	7585%	132%	1,576	90,587	5749%	116%
2075	995	80,191	8058%	132%	1,191	72,691	6102%	116%
2076	744	65,341	8783%	132%	891	59,119	6639%	117%
2077	549	51,541	9393%	132%	657	46,566	7091%	117%
2078	400	39,192	9808%	132%	478	35,372	7399%	117%
Total Projected	81,478,338	178,225,518	219%	132%	93,723,797	170,160,252	182%	117%
Total Lifetime	144,836,633	191,196,327	132%	132%	157,082,091	183,131,061	117%	117%
Values Accumulated/Discounted to 12/31/18 at Maximum Statutory Valuation Interest Rates								
Past	90,907,154	16,832,620	19%	19%	90,907,154	16,832,620	19%	19%
Future	55,558,751	85,871,126	155%	155%	63,445,330	82,447,949	130%	130%
Lifetime	146,465,906	102,703,746	70%	70%	154,352,484	99,280,569	64%	64%

Exhibit 5a
Continental Casualty Company
Nationwide 58/85 Test with Increase
Group Long Term Care - Insureds with Standard Lifetime ABI

1	Accumulated value of initial earned premium	643,841,254	x 58% =	373,427,927
2a	Accumulated value of earned premium	664,908,551		
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	21,067,297	x 85% =	17,907,202
3	Present value of future projected initial earned premium	268,321,254	x 58% =	155,626,327
4a	Present value of future projected premium	653,154,077		
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	384,832,823	x 85% =	327,107,899.58
5	Lifetime Earned Premium Times Prescribed Factors: Sum of 1, 2b, 3, and 4b			874,069,356
6a	Accumulated value of incurred claims without the inclusion of active life reserves			188,436,500
6b	Present value of future projected incurred claims without the inclusion of active life reserves			1,474,675,084
7	Lifetime Incurred Claims with Rate Increase: Sum of 6a and 6b			1,663,111,584
8	Test: 7 is not less than 5			TRUE
<p>All values are accumulated or discounted at the average maximum valuation interest rate for contract reserves which averages 4.38%. The incurred claims (items 6a and 6b) were increased by 10% to reflect moderately adverse experience.</p>				

Exhibit 5b
Continental Casualty Company
Nationwide 58/85 Test with Increase
Group Long Term Care - Insureds without Standard Lifetime ABI

1	Accumulated value of initial earned premium	3,474,348,219	x 58% =	2,015,121,967
2a	Accumulated value of earned premium	3,571,322,280		
2b	Accumulated value of prior premium rate schedule increases (2a - 1)	96,974,061	x 85% =	82,427,951
3	Present value of future projected initial earned premium	1,093,208,965	x 58% =	634,061,200
4a	Present value of future projected premium	2,128,871,367		
4b	Present value of future projected premium in excess of the projected initial earned premiums (4a - 3)	1,035,662,401	x 85% =	880,313,041
5	Lifetime Earned Premium Times Prescribed Factors: Sum of 1, 2b, 3, and 4b			3,611,924,160
6a	Accumulated value of incurred claims without the inclusion of active life reserves			1,056,558,742
6b	Present value of future projected incurred claims without the inclusion of active life reserves			3,229,234,417
7	Lifetime Incurred Claims with Rate Increase: Sum of 6a and 6b			4,285,793,159
8	Test: 7 is not less than 5			TRUE
<p>All values are accumulated or discounted at the average maximum valuation interest rate for contract reserves which averages 4.38%. The incurred claims (items 6a and 6b) were increased by 10% to reflect moderately adverse experience.</p>				



CNA Center
151 North Franklin Street
Chicago, IL 60606

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February 4, 2020

Honorable Jessica K. Altman
Commissioner
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, Pennsylvania 17120

Re: Continental Casualty Company
(NAIC #218-20443, FEIN #36-2114545)
SERFF Tracking #CNAB-132209522
Rate Increase Filing for Group Long Term Care Policy Forms:

- “GLTC1”: P1-43636-A, et al
- “GLTC2”: SR-LTCP-Series, et al
- “Independent Solutions”: GLTC-3-P-xx-01, et al

Dear Commissioner Altman:

Enclosed is a request for a premium rate increase for the above captioned group long term care policy forms, including all associated riders. This increase is requested in order to establish premium rates that are reasonable in relation to benefits based on actual historical experience and best-estimate projections for these forms. The method that we used to determine the requested premium rate increase is outlined in the enclosed actuarial memorandum and supporting exhibits.

The rate increase indication varies by benefit feature, specifically the lifetime automatic benefit increase (“ABI”) benefit, as follows:

Benefit Feature	Requested Rate Increase
Insureds without Standard Lifetime ABI	19.1%
Insureds with Standard Lifetime ABI	69.9%
Weighted Average Total (Based on Pennsylvania’s Premium Distribution)	28.5%

All of these forms provide the insured guaranteed renewable group long term care insurance. Our group long term insurance is a closed block and is not being marketed to any new groups. In addition to not offering

coverage to any new groups, we stopped offering coverage to any new enrollees within existing groups effective February 1, 2016.

The new premium rates will be applied to all insureds under group policies that were situated in your state except insureds under group policies situated in your state that were issued certificates in a state that is an extraterritorial (ET) jurisdiction. These insureds are governed by the ET state's laws and regulations and will be included in that state for rate increase purposes.

The proposed premium rates will be effective on the insured's next premium due date following a notification period at least as long as required by your state following approval. No insured will receive more than one rate increase in a 12-month period.

All impacted insureds will be offered the option to reduce coverage so as to offset all or part of the rate increase. When insureds are notified of the rate increase, they will be encouraged to call our customer service staff and discuss these options if they so desire. Available options will depend upon the insured's current coverage levels, benefit options available under their group plan, and any statutory minimum benefit levels in your state. Insureds with a standard lifetime ABI benefit will also receive a personalized quote for dropping the ABI benefit in their rate increase notification letter.

Although many insureds have contractual non-forfeiture benefits, the Company is making a non-forfeiture option available for all policyholders in conjunction with this rate increase. This option provides a paid-up policy with a shortened benefit period equal to the total of premiums paid, less any claims paid.

For states that do not approve the full requested increase, the Company anticipates that additional rate increase filings will be necessary in the near future. The exact timing of when an additional filing will be made and the amount that will be requested will be determined by the attributes of these policy forms, the Company's experience, and applicable laws and regulations.

Included with this request are the following items:

- this cover letter;
- an actuarial memorandum including supporting exhibits; and
- a rate supplement page reflecting the rate increase request.

We respectfully request your favorable consideration and approval of this filing.



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