

**State:** Pennsylvania **Filing Company:** Continental General Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** CGI 440 RATE INCREASE FILING FOR 2019/

### Filing at a Glance

Company: Continental General Insurance Company  
 Product Name: Long Term Care  
 State: Pennsylvania  
 TOI: LTC03I Individual Long Term Care  
 Sub-TOI: LTC03I.001 Qualified  
 Filing Type: Rate - Other (Not M.U. or G.I. Product)  
 Date Submitted: 01/29/2020  
 SERFF Tr Num: GLTC-132119342  
 SERFF Status: Assigned  
 State Tr Num: GLTC-132119342  
 State Status: Received Review in Progress  
 Co Tr Num: CGI 440 RATE INCREASE FILING FOR 2019  
  
 Implementation: On Approval  
 Date Requested:  
 Author(s): Beth Lovaas, Cameron Zima, Huyen Pham, Elizabeth Burchfield, Ryan Huntley, Noah Simonson, Cheryl Casker, Melissa Sample, Elizabeth O'Brien, Kristie Pompa, Sean Zhou, Madison Nahrup  
 Reviewer(s): Jim Laverty (primary)  
 Disposition Date:  
 Disposition Status:  
 Implementation Date:

**State Filing Description:**  
 Proposed aggregate 144.4% (42% on the base & 243% on the inflation rider) increase on 42 PA policyholders of CGI form 440.

**State:** Pennsylvania **Filing Company:** Continental General Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** CGI 440 RATE INCREASE FILING FOR 2019/

## General Information

Project Name: CGI 440 RATE INCREASE FILING FOR 2019 Status of Filing in Domicile: Not Filed  
Project Number: Date Approved in Domicile:  
Requested Filing Mode: Domicile Status Comments: State of domicile is Texas.  
Explanation for Combination/Other: Market Type: Individual  
Submission Type: New Submission Individual Market Type:  
Overall Rate Impact: 144.4% Filing Status Changed: 01/30/2020  
State Status Changed: 01/30/2020  
Deemer Date: Created By: Elizabeth O'Brien  
Submitted By: Elizabeth O'Brien Corresponding Filing Tracking Number:  
State TOI: LTC03I Individual Long Term Care

Filing Description:

Dear Sir or Madam:

Enclosed for your review, please find copies of an Actuarial Memorandum and rate sheets in support of the current proposed increases on the above-referenced Individual Long-Term Care Insurance products. Detailed information regarding the calculation of the current proposed rate increases is given within the enclosed Actuarial Memorandum.

The base rate increase applies to the base policy and all applicable benefit riders for which a premium is paid. In addition to a base rate increase, an increase is being requested on the Inflation Guard Rider percentage load. The rate increases will be effective on the first premium due date subsequent to state insurance department approval and in accordance with state policyholder notification requirements, with the additional condition that no policyholder will receive a rate increase sooner than one year after receiving a prior rate increase, if applicable.

This filing applies to inforce policies issued in this state. The above-referenced policy forms are Individual Long-Term Care Insurance products, which are no longer being sold.

The Company would like this rate increase filing to be reviewed under the Department's normal, non-expedited, review process. Please let us know if any additional information is required.

Enclosed are any necessary certifications, transmittals and/or filing fees as may be required by your state. I hope that with this information, your approval of this filing will be forthcoming. If you have any questions or need additional information, please feel free to contact me.

Sincerely,

Elizabeth A. O'Brien, FSA, MAAA  
Associate Actuary  
Continental General Insurance Company  
11001 Lakeline Blvd, Suite 120  
Austin, Texas 78717

## Company and Contact

State: Pennsylvania Filing Company: Continental General Insurance Company  
 TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified  
 Product Name: Long Term Care  
 Project Name/Number: CGI 440 RATE INCREASE FILING FOR 2019/

**Filing Contact Information**

Elizabeth O'Brien, Associate Actuary      elizabeth.obrien@continental-ins.com  
 11001 Lakeline Blvd.,      866-830-0607 [Phone] 2809 [Ext]  
 Suite 120      512-646-2663 [FAX]  
 Austin, TX 78717

**Filing Company Information**

Continental General Insurance Company      CoCode: 71404      State of Domicile: Texas  
 11001 Lakeline Blvd      Group Code: 84      Company Type: Life & Health  
 Suite 120      Group Name:      State ID Number:  
 Austin, TX 78717      FEIN Number: 47-0463747  
 (866) 830-0607 ext. [Phone]

**Filing Fees**

Fee Required?      Yes  
 Fee Amount:      \$100.00  
 Retaliatory?      Yes  
 Fee Explanation:      Texas rate filing fee is \$100.00  
 Per Company:      Yes

Company	Amount	Date Processed	Transaction #
Continental General Insurance Company	\$100.00	01/29/2020	173175250

State: Pennsylvania      Filing Company: Continental General Insurance Company  
 TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified  
 Product Name: Long Term Care  
 Project Name/Number: CGI 440 RATE INCREASE FILING FOR 2019/

### Rate Information

Rate data applies to filing.

Filing Method: SERFF  
 Rate Change Type: Increase  
 Overall Percentage of Last Rate Revision: 7.200%  
 Effective Date of Last Rate Revision: 05/23/2018  
 Filing Method of Last Filing: SERFF  
 SERFF Tracking Number of Last Filing: GLTC-131216195

### 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 General Insurance Company	144.400%	144.400%	\$233,228	42	\$161,571	177.900%	42.000%

**SERFF Tracking #:**

GLTC-132119342

**State Tracking #:**

GLTC-132119342

**Company Tracking #:**

CGI 440 RATE INCREASE FILING FOR  
2019

**State:**

Pennsylvania

**Filing Company:**

Continental General Insurance Company

**TOI/Sub-TOI:**

LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:**

Long Term Care

**Project Name/Number:**

CGI 440 RATE INCREASE FILING FOR 2019/

## Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		440 Rate Sheets - PA	440	Revised	Previous State Filing Number: GLTC-131216195 Percent Rate Change Request: 144.4	440 Rate Sheets - PA.pdf,

**Continental General Insurance Company**  
**Individual Long Term Care Insurance Policy Forms:**  
440, 442, 443, 444, 445, 446, 448, 449

The Company has revised the structure of its rate sheets to demonstrate the Inflation Guard Rider rates in dollars rather than factor loads. Rate sheets are provided for base and base with the Inflation Guard Rider. These rate sheets provide a better representation of the premiums being charged to policyholders with these benefits.

**CONTINENTAL GENERAL INSURANCE COMPANY**

P.O. Box 203098 • Austin, Texas 78720-3098 • (866) 830-0607

**Policy Form 440**

**Annual Premiums Per \$10 Daily Benefit**

Age	Two Year Benefit Period			Four Year Benefit Period			Unlimited Benefit Period		
	0 Day	30 Day	100 Day	0 Day	30 Day	100 Day	0 Day	30 Day	100 Day
	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination
50-54	87	80	68	118	107	87	140	130	111
55-59	122	111	95	167	151	122	206	190	163
60	194	175	144	250	227	190	305	285	250
61	202	179	151	258	235	202	326	301	262
62	214	190	159	270	247	206	338	314	270
63	227	202	163	289	262	221	361	338	293
64	247	217	175	305	278	231	384	357	305
65	281	250	202	361	330	278	448	417	365
66	314	278	221	392	357	297	493	456	392
67	338	301	243	433	392	326	544	505	433
68	373	334	270	476	433	365	592	551	479
69	406	361	289	524	476	396	662	615	524
70	441	392	322	575	524	437	726	676	578
71	493	437	353	635	578	479	798	742	631
72	540	479	388	707	643	536	881	817	699
73	588	524	429	790	718	596	984	916	790
74	646	575	472	874	794	662	1,083	1,007	870
75	722	643	520	973	885	734	1,202	1,120	957
76	798	710	578	1,087	988	817	1,337	1,242	1,064
77	889	790	643	1,207	1,099	912	1,489	1,386	1,190
78	976	870	710	1,337	1,219	1,011	1,642	1,528	1,314
79	1,072	953	778	1,460	1,330	1,110	1,801	1,675	1,444
80	1,167	1,037	844	1,584	1,440	1,211	1,961	1,821	1,576
81	1,262	1,120	912	1,706	1,551	1,310	2,120	1,968	1,706
82	1,357	1,202	980	1,831	1,664	1,409	2,279	2,116	1,838
83	1,452	1,285	1,048	1,953	1,774	1,508	2,436	2,261	1,968
84	1,547	1,369	1,116	2,075	1,885	1,607	2,595	2,409	2,100

**Premium Modal Factors**

Semi-Annual: 0.520 of Annual Rate  
 Quarterly: 0.265 of Annual Rate

Monthly Direct: 0.090 of Annual Rate  
 Monthly B.O.M.: 0.085 of Annual Rate

**CONTINENTAL GENERAL INSURANCE COMPANY**

P.O. Box 203098 • Austin, Texas 78720-3098 • (866) 830-0607

**Policy Form 440**

**Annual Premiums Per \$10 Daily Benefit  
Including Inflation Guard Rider**

Age	Two Year Benefit Period			Four Year Benefit Period			Unlimited Benefit Period		
	0 Day	30 Day	100 Day	0 Day	30 Day	100 Day	0 Day	30 Day	100 Day
	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination
50-54	142	129	110	192	173	142	226	211	179
55-59	196	177	152	267	242	196	329	304	261
60	307	276	227	396	359	301	482	451	396
61	317	280	238	405	369	317	512	472	411
62	335	299	250	424	387	323	530	494	424
63	354	315	254	451	409	345	563	527	457
64	385	339	273	475	433	360	600	557	475
65	436	388	313	560	511	430	695	647	566
66	487	430	343	608	554	460	764	707	608
67	520	463	374	667	604	502	837	777	667
68	574	514	416	732	667	562	912	849	738
69	621	552	443	802	728	606	1,013	941	802
70	674	600	493	879	802	668	1,111	1,034	885
71	745	660	533	958	873	724	1,205	1,120	953
72	804	714	578	1,053	957	798	1,313	1,218	1,041
73	870	776	635	1,169	1,063	882	1,457	1,356	1,169
74	944	839	689	1,275	1,159	966	1,581	1,471	1,270
75	1,047	932	754	1,410	1,283	1,064	1,742	1,624	1,388
76	1,149	1,023	833	1,565	1,423	1,177	1,926	1,789	1,532
77	1,271	1,130	919	1,727	1,571	1,305	2,129	1,982	1,702
78	1,386	1,235	1,009	1,899	1,731	1,436	2,332	2,169	1,866
79	1,511	1,344	1,098	2,058	1,875	1,566	2,540	2,362	2,036
80	1,633	1,451	1,182	2,218	2,016	1,696	2,745	2,549	2,207
81	1,754	1,557	1,268	2,372	2,156	1,821	2,946	2,736	2,372
82	1,872	1,658	1,353	2,526	2,296	1,945	3,145	2,920	2,537
83	1,989	1,761	1,436	2,675	2,431	2,066	3,337	3,098	2,697
84	2,104	1,861	1,518	2,822	2,563	2,186	3,530	3,276	2,856

**Premium Modal Factors**

Semi-Annual: 0.520 of Annual Rate  
Quarterly: 0.265 of Annual Rate

Monthly Direct: 0.090 of Annual Rate  
Monthly B.O.M.: 0.085 of Annual Rate



**CONTINENTAL GENERAL INSURANCE COMPANY**

P.O. Box 203098 • Austin, Texas 78720-3098 • (866) 830-0607

**Policy Form 440**

**Home Health Care Rider Per \$10 Daily Benefit, 5 Day Elimination Period**

Age	Base Plan			Base Plan With Inflation Guard Rider		
	2 Year	4 Year	Unlimited	2 Year	4 Year	Unlimited
	Maximum	Maximum	Maximum	Maximum	Maximum	Maximum
50-54	49	68	107	79	110	173
55-59	56	83	136	90	134	217
60	68	99	159	107	156	251
61	72	107	171	113	168	268
62	76	115	182	119	180	286
63	80	118	190	124	185	297
64	87	126	202	136	197	315
65	91	140	221	141	217	343
66	95	148	235	147	229	364
67	103	155	247	158	239	380
68	107	167	266	164	257	410
69	118	179	285	181	273	437
70	126	190	305	193	291	466
71	136	202	326	205	305	492
72	148	217	349	220	324	521
73	159	239	380	236	353	563
74	167	258	413	244	377	604
75	182	278	445	265	402	645
76	198	301	483	285	433	696
77	217	330	528	311	472	755
78	235	353	563	334	502	799
79	254	380	611	359	536	862
80	274	421	676	383	590	946
81	297	448	718	413	623	998
82	318	476	763	439	656	1,053
83	342	505	806	468	691	1,104
84	361	532	850	491	723	1,156

**Premium Modal Factors**

Semi-Annual:	0.520 of Annual Rate	Monthly Direct:	0.090 of Annual Rate
Quarterly:	0.265 of Annual Rate	Monthly B.O.M.:	0.085 of Annual Rate

**CONTINENTAL GENERAL INSURANCE COMPANY**

P.O. Box 203098 • Austin, Texas 78720-3098 • (866) 830-0607

**Policy Form 440**

**Annual Premiums Per \$10 Daily Benefit**

Age	Two Year Benefit Period			Four Year Benefit Period			Unlimited Benefit Period		
	0 Day	30 Day	100 Day	0 Day	30 Day	100 Day	0 Day	30 Day	100 Day
	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination
45-49	119	108	91	163	146	119	193	179	152
50-54	124	113	96	168	152	124	198	185	157
55-59	174	157	135	237	215	174	292	270	232
60	276	248	204	356	323	270	433	405	356
61	287	254	215	367	334	287	463	427	372
62	303	270	226	383	350	292	480	447	383
63	323	287	232	411	372	314	513	480	416
64	350	309	248	433	394	328	546	507	433
65	400	356	287	513	469	394	637	593	518
66	447	394	314	557	507	422	700	648	557
67	480	427	345	615	557	463	772	717	615
68	529	474	383	675	615	518	841	783	681
69	576	513	411	744	675	562	940	874	744
70	626	557	458	816	744	620	1,031	959	821
71	700	620	502	901	821	681	1,133	1,053	896
72	766	681	551	1,003	912	761	1,251	1,160	992
73	835	744	609	1,122	1,020	846	1,398	1,301	1,122
74	918	816	670	1,240	1,127	940	1,538	1,431	1,235
75	1,025	912	739	1,381	1,257	1,042	1,706	1,590	1,359
76	1,133	1,009	821	1,544	1,403	1,160	1,899	1,764	1,511
77	1,262	1,122	912	1,714	1,560	1,296	2,114	1,968	1,690
78	1,386	1,235	1,009	1,899	1,731	1,436	2,332	2,169	1,866
79	1,522	1,353	1,105	2,073	1,888	1,577	2,558	2,379	2,051
80	1,657	1,472	1,199	2,249	2,045	1,720	2,784	2,586	2,238
81	1,792	1,590	1,296	2,423	2,202	1,861	3,010	2,795	2,423
82	1,927	1,706	1,392	2,599	2,362	2,001	3,236	3,005	2,610
83	2,062	1,825	1,488	2,773	2,519	2,142	3,459	3,211	2,795
84	2,197	1,943	1,585	2,947	2,676	2,282	3,685	3,421	2,982

**Premium Modal Factors**

Semi-Annual:	0.520 of Annual Rate	Monthly Direct:	0.090 of Annual Rate
Quarterly:	0.265 of Annual Rate	Monthly B.O.M.:	0.085 of Annual Rate

**CONTINENTAL GENERAL INSURANCE COMPANY**

P.O. Box 203098 • Austin, Texas 78720-3098 • (866) 830-0607

**Policy Form 440**

**Annual Premiums Per \$10 Daily Benefit  
Including Inflation Guard Rider**

Age	Two Year Benefit Period			Four Year Benefit Period			Unlimited Benefit Period		
	0 Day	30 Day	100 Day	0 Day	30 Day	100 Day	0 Day	30 Day	100 Day
	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination	Elimination
45-49	383	347	294	525	472	383	623	579	490
50-54	388	353	302	526	474	388	621	577	491
55-59	531	480	413	725	657	531	893	826	708
60	824	742	610	1,063	964	808	1,294	1,211	1,063
61	847	749	635	1,083	986	847	1,368	1,263	1,100
62	896	798	668	1,132	1,034	863	1,417	1,320	1,132
63	942	837	676	1,200	1,087	918	1,497	1,401	1,216
64	1,022	902	725	1,264	1,151	958	1,594	1,481	1,264
65	1,154	1,026	827	1,480	1,353	1,138	1,838	1,711	1,496
66	1,289	1,138	907	1,607	1,464	1,217	2,021	1,870	1,607
67	1,368	1,219	983	1,753	1,588	1,321	2,201	2,044	1,753
68	1,509	1,352	1,093	1,926	1,753	1,478	2,398	2,233	1,942
69	1,623	1,445	1,157	2,097	1,903	1,585	2,649	2,462	2,097
70	1,763	1,569	1,289	2,299	2,097	1,748	2,905	2,703	2,315
71	1,925	1,705	1,379	2,478	2,258	1,872	3,115	2,895	2,463
72	2,054	1,825	1,478	2,690	2,446	2,039	3,355	3,111	2,660
73	2,210	1,970	1,612	2,969	2,699	2,239	3,698	3,443	2,969
74	2,366	2,103	1,727	3,197	2,906	2,423	3,965	3,688	3,183
75	2,608	2,321	1,879	3,512	3,197	2,650	4,340	4,045	3,456
76	2,843	2,531	2,061	3,873	3,520	2,912	4,765	4,427	3,790
77	3,124	2,776	2,258	4,243	3,861	3,206	5,232	4,871	4,182
78	3,384	3,014	2,462	4,635	4,225	3,505	5,691	5,294	4,554
79	3,661	3,257	2,660	4,988	4,543	3,794	6,155	5,724	4,935
80	3,929	3,491	2,844	5,335	4,851	4,080	6,604	6,133	5,309
81	4,188	3,718	3,029	5,664	5,149	4,349	7,037	6,534	5,664
82	4,438	3,930	3,206	5,987	5,441	4,609	7,454	6,921	6,013
83	4,678	4,141	3,377	6,292	5,717	4,860	7,850	7,287	6,342
84	4,910	4,343	3,542	6,585	5,981	5,101	8,236	7,645	6,665

**Premium Modal Factors**

Semi-Annual:	0.520 of Annual Rate	Monthly Direct:	0.090 of Annual Rate
Quarterly:	0.265 of Annual Rate	Monthly B.O.M.:	0.085 of Annual Rate

**CONTINENTAL GENERAL INSURANCE COMPANY**

P.O. Box 203098 • Austin, Texas 78720-3098 • (866) 830-0607

**Policy Form 440**

**Home Health Care Rider Per \$10 Daily Benefit, 5 Day Elimination Period**

Age	Base Plan			Base Plan With Inflation Guard Rider		
	2 Year	4 Year	Unlimited	2 Year	4 Year	Unlimited
	Maximum	Maximum	Maximum	Maximum	Maximum	Maximum
45-49	69	91	146	223	294	472
50-54	69	96	152	215	302	474
55-59	80	119	193	244	362	590
60	96	141	226	288	420	676
61	102	152	243	301	448	717
62	108	163	259	318	481	766
63	113	168	270	330	491	789
64	124	179	287	362	523	837
65	130	198	314	374	573	907
66	135	209	334	390	605	963
67	146	221	350	417	629	998
68	152	237	378	432	676	1,077
69	168	254	405	474	715	1,142
70	179	270	433	505	761	1,219
71	193	287	463	530	788	1,273
72	209	309	496	562	828	1,330
73	226	339	540	598	897	1,430
74	237	367	587	611	945	1,513
75	259	394	631	659	1,003	1,606
76	281	427	686	705	1,072	1,722
77	309	469	750	764	1,160	1,856
78	334	502	799	814	1,224	1,951
79	361	540	868	869	1,300	2,089
80	389	598	959	922	1,419	2,275
81	422	637	1,020	986	1,488	2,384
82	452	675	1,083	1,041	1,556	2,495
83	485	717	1,144	1,101	1,626	2,596
84	513	755	1,207	1,146	1,688	2,698

**Premium Modal Factors**

Semi-Annual:	0.520 of Annual Rate	Monthly Direct:	0.090 of Annual Rate
Quarterly:	0.265 of Annual Rate	Monthly B.O.M.:	0.085 of Annual Rate

Continental General Insurance Company  
Form NF-RPU  
**Nonforfeiture Benefit Rider**

**Policy Form 440**

<u>Issue Ages</u>	<u>Premium Percentages %</u>
45-54	20
55-59	18
60-64	16
65-69	15
70-74	14
75-79	13
80-84	12

State: Pennsylvania	Filing Company: Continental General Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified	
Product Name: Long Term Care	
Project Name/Number: CGI 440 RATE INCREASE FILING FOR 2019/	

## Supporting Document Schedules

<b>Bypassed - Item:</b>	Transmittal Letter (A&H)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	Actuarial Certification (A&H)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Actuarial Memorandum and Explanatory Information (A&H)
<b>Comments:</b>	
<b>Attachment(s):</b>	440 Cover Letter - PA.pdf 440 Actuarial Memorandum - PA.pdf 440 Exhibits - PA.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	Advertisements (A&H)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	Authorization to File (A&H)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	Insert Page Explanation (A&H)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	

SERFF Tracking #:

GLTC-132119342

State Tracking #:

GLTC-132119342

Company Tracking #:

CGI 440 RATE INCREASE FILING FOR 2019

State:

Pennsylvania

Filing Company:

Continental General Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Long Term Care

Project Name/Number:

CGI 440 RATE INCREASE FILING FOR 2019/

<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	Rate Table (A&H)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	Replacement Form with Highlighted Changes (A&H)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	Advertisement Compliance Certification
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	Reserve Calculation (A&H)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Bypassed - Item:</b>	Variability Explanation (A&H)
<b>Bypass Reason:</b>	N/A
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	



P.O. Box 203098  
Austin, TX 78720-3098  
Toll Free: (866) 830-0607  
Fax: (888) 769-0737

January 29, 2020

Pennsylvania Insurance Department  
1326 Strawberry Square  
Harrisburg, Pennsylvania 17120

**RE: Continental General Insurance Company**  
**NAIC No: 71404**  
**Rate Revision Filing on Individual Long-Term Care Insurance**  
**Policy Forms: 440 et al.**  
**SERFF Tracking Number: GLTC-132119342**

Dear Sir or Madam:

Enclosed for your review, please find copies of an Actuarial Memorandum and rate sheets in support of the current proposed increases on the above-referenced Individual Long-Term Care Insurance products. Detailed information regarding the calculation of the current proposed rate increases is given within the enclosed Actuarial Memorandum.

The base rate increase applies to the base policy and all applicable benefit riders for which a premium is paid. In addition to a base rate increase, an increase is being requested on the Inflation Guard Rider percentage load. The rate increases will be effective on the first premium due date subsequent to state insurance department approval and in accordance with state policyholder notification requirements, with the additional condition that no policyholder will receive a rate increase sooner than one year after receiving a prior rate increase, if applicable.

This filing applies to inforce policies issued in this state. The above-referenced policy forms are Individual Long-Term Care Insurance products, which are no longer being sold.

Enclosed are any necessary certifications, transmittals and/or filing fees as may be required by your state. I hope that with this information, your approval of this filing will be forthcoming. If you have any questions or need additional information, please feel free to contact me.

Sincerely,

---

Elizabeth A. O'Brien, FSA, MAAA  
Associate Actuary  
Continental General Insurance Company  
11001 Lakeline Blvd, Suite 120  
Austin, Texas 78717

*Long-term care administrator for:*  
Great American Life Insurance Company®  
Loyal American Life Insurance Company®



**CONTINENTAL GENERAL INSURANCE COMPANY**

**Home Office:**

P.O. Box 203098

Austin, Texas 78720-3098

**Actuarial Memorandum for Premium Rate Increases of:  
42% on Base Policy Forms and Riders, and  
243% on the Inflation Guard Rider (IGR) Percentage Load for**

**Continental General Insurance Company**

**Individual Long-Term Care Insurance Policy Forms:**

440, 442, 443, 444, 445, 446, 448, 449, 450, 460, 461, 462, 463, 470, 471

**NFO Riders:** NF-RPU(Q), NF-RPU(Q)(A), NF-RPU(Q), NFB, NBR, et al.

**Benefit Increase Riders:** GPO-E, GPO-R, et al.

**Inflation Guard Riders:** IG(Q)-1, IG(Q)-1(SC), IG(Q)-1(A), IG(Q)-1(449), IG(Q)-1(2),  
IG-R, et al.

**HHC Riders:** HC(Q), HC(Q)(A), et al.

**Miscellaneous Riders:** CC(Q), SPAR, TQA-R, et al.

**One-Time Return of Premium Riders:** PAR, PAR(A), et al.

**Perpetual Return of Premium Rider:** RP(LTC)10-1, et al.

**I. Purpose of Filing**

The purpose of this rate filing is to support and request a 42% rate increase on the Base Policy Forms and Riders for the above listed policy form series, and to support and request a 243% rate increase on the Inflation Guard Rider (IGR) percentage load. This filing may not be appropriate for other purposes.

Details on the methodology for calculating the unfunded gap in future liabilities and the resulting overall rate increase can be found in Section IV below.

Rate sheets are attached showing premium rates after the 42% Base premium rate increase and 243% IGR percentage load increases. Please note, rate sheets do not demonstrate percentage loads to add inflation protection, but instead have dollar amounts. Premium rates will be increased by an amount equivalent to the 42% Base premium rate increase and 243% IGR percentage load increase.

As shown in **Exhibit 3a**, the projected lifetime loss ratio adjusted to reflect the State's specific rate increase history for Base Policy Forms and Non-ROP Riders, assuming implementation of the proposed rate increase, is 88.6%.

**II. Policyholder Options to Mitigate Impact of Premium Rate Increases**

*Offers for Policyholders with Perpetual Return of Premium Riders: RP(LTC)10-1*

In order to mitigate the impact of the increases on policyholders with Return of Premium riders, the Company will implement a program in which the policyholder will have the choice to surrender their ROP benefit for value, while keeping their Base Policy and other non-ROP Riders in force. The offer will vary by the duration within the 10-year ROP "cycle" as follows:

- For policyholders in durations with a scheduled ROP benefit of 0%, the offer will be 100% of cumulative paid ROP Rider premium within the current 10-year ROP cycle, less the value of any policyholder benefits paid within the current 10-year ROP cycle.
- For policyholders in durations with a scheduled ROP benefit greater than 0% (except for duration 10), the offer will be the scheduled ROP benefit + 10%, less the value of any policyholder benefits paid within the current 10-year ROP cycle.
- For policyholders in duration 10, the offer will be the scheduled ROP benefit.

Under the predominant ROP payment schedule, the ROP offers assuming no policyholder benefits having been paid within the 10-year ROP duration “cycle” will be as follows:

Duration	% of Cumulative ROP Rider Premium					% of Total Cumulative Premium				
	1	2	3	4	5	6	7	8	9	10
Refund %	100%	100%	100%	100%	100%	25%	40%	55%	70%	80%

Optional Policyholder offers to Reduce Benefits

In addition, the Company will give policyholders Benefit Reduction Offers to help mitigate the impact to policyholders of the premium rate increase on the Base policy. The Benefit Reduction Offers will allow the policyholder to:

1. Lower their lifetime maximum benefit,
2. Lower their daily benefit,
3. Increase their elimination period.

Non-forfeiture Offers

In addition, the Company will give the policyholder the option to accept a shortened benefit period. Acceptance of this offer will provide the policyholder with a paid-up policy, with no future premiums required. Under this paid-up policy, the maximum benefit amount is equal to the greater of the sum of premiums paid less any benefits paid by a Return of Premium or Premium Accrual Benefit Rider or 30 times their daily benefit, and the daily benefit amount is equal to the policyholder’s current daily benefit amount. This non-forfeiture benefit shall not exceed the policyholder's remaining unused Maximum Lifetime Benefit at the time of conversion. Each day any benefits are received will count as one full day toward the completion of the shortened benefit period. This offer will be made to all policyholders.

**III. Scope of Filing**

This filing applies to active premium-paying policies issued in this state for the policy forms listed above. These forms are no longer being marketed in any state and the Company is no longer selling any new Long-Term Care Insurance. **Exhibit 1** provides a distribution by state of the number of lives and associated annualized premium for active premium-paying lives as of 10/31/2018 under these policy forms. The annualized premium inforce Nationwide as of 10/31/2018 was 6,984,810. A breakdown of lives affected by this filing in this state is shown in **Appendix A**.

Please note that experience associated with the Return of Premium (ROP) Rider has been excluded from this filing.

#### IV. Premium Rate Increase Justification

A rate increase is necessary at this time because Company experience on its Long-Term Care Insurance business indicates that the premium rates for these policy forms are inadequate. Premium rate increases that help to remediate poorly performing blocks of business and limit any future losses are important to maintaining the Company's ability to meet policyholder obligations and pay future claims.

##### A. Rate Increase Formula: Gap Analysis

The current projected earned premium shortfall, or "Gap," is calculated as the present value of future claims and expenses less the present value of future premium and the active life reserve as of 12/31/2016. Gap Analysis was completed using cash flows for calendar years 2017+ and present values as of 12/31/2016 consistent with the prior submitted rate increase filing. Cash flows were adjusted to reflect the State's specific rate increase history. The calculation excludes experience associated with lives that were paid up as of 12/31/2016. The justified premium rate increase is calculated as the rate increase necessary so that the projected gap is approximately zero.

Formulaically, Gap Analysis can be described as calculating the rate increase that would satisfy the equation below on a strictly prospective basis from the Gap analysis valuation date:

$$PV \text{ Incurred Claims} + PV \text{ Expenses} = PV \text{ Earned Premium} + \text{Active Life Reserves}$$

##### B. Justified Rate Increase

The justified increase is the rate increase which would satisfy Gap Analysis given actual Nationwide experience has been adjusted to reflect the State's specific rate increase history. As demonstrated in the table below, a rate increase of 42% on the Base policy form and riders combined with a rate increase of 243% on the Inflation Guard Rider percentage load would result in a projected Gap of approximately \$0.0M as of 12/31/2016. Values in the table below are shown in millions of dollars.

	<i>Base Increase: 42%</i> <i>IGR Load Increase: 243%</i>	
	<b>Before Increase</b>	<b>After Increase</b>
Nationwide Active Life Reserve (ALR)	77.6	77.6
Present Value of Nationwide Projected Earned Premium <sup>1</sup>	55.2	89.1
Present Value of Nationwide Projected Future Expenses <sup>1</sup>	11.0	11.4
Present Value of Nationwide Projected Incurred Claims <sup>1</sup>	153.7	155.7
Expected Earned Premium Shortfall (Gap)	31.9	0

The values in the "After Increase" column reflect the expected increase in Earned Premium, Waived Premium, and Premium-based claims and expenses given implementation of the above premium rate increases on 7/1/2020. These values also include the impact of shock lapse and

<sup>1</sup> Present Value of Nationwide values, adjusted to State-specific levels

non-forfeiture residual liability resulting from the rate increase. These assumptions are described in more detail in Section V below.

**C. Minimum Loss Ratio Requirement**

Although the rate increases in this filing are not calculated to achieve a target loss ratio, this filing demonstrates that, even after implementation of the justified rate increases, both the projected future loss ratio and the lifetime anticipated loss ratio for these forms are higher than the required minimum loss ratio and therefore benefits are reasonable in relation to premiums. The required minimum loss ratio for these policy forms is as follows:

Type of Coverage:	Long-Term Care Insurance
Renewal Clause:	Guaranteed Renewable
Required Minimum Loss Ratio:	60%

The current lifetime anticipated loss ratio is 98.9%; assuming the justified rate increases are approved, the lifetime anticipated loss ratio will be 88.6%. These lifetime loss ratios are demonstrated in **Exhibit 3a**.

**V. Actuarial Assumptions**

The actuarial assumptions used to project the future premiums and claims are described in this section. **Appendix D** provides further details of the experience studies conducted that were used to develop the actuarial assumptions.

**A. Interest**

A 5.0% annual rate of interest has been assumed for accumulating historical experience and for discounting projected future experience to present values.

**B. Mortality**

The best estimate future mortality assumption is 100% of the Individual Mortality (IAM) 2012 Base Table with mortality steepening factors, selection factors, and other attained age adjustments. The selection factors vary by issue age and range from 0.20 to 1.05.

**C. Voluntary Lapse**

The voluntary lapse assumptions were developed from a policy persistency study conducted on the Company's experience through June 2018 on these forms and judgment. Lapse rates are combined with mortality rates and benefit exhaust rates to derive the total termination rate. It is assumed all remaining policies would terminate at attained age 120. The lapse assumptions represent the best estimate expectations of future experience and do not include any provisions for adverse experience. All policies in this form series are currently in durations 10+, for which the lapse rates shown below are applicable. Lapse rates vary by gender, marital status, inflation versus non-inflation and ROP versus non-ROP. The table below shows the detailed applicable lapse assumptions.

Voluntary Lapse Rate				
Duration	Married		Single	
	Inflation	Non-Inflation	Inflation	Non-Inflation
10	0.93%	2.03%	3.37%	4.19%
11	0.62%	1.74%	3.06%	3.81%
12	0.62%	1.74%	2.45%	3.05%
13	0.50%	1.45%	2.14%	2.67%
14	0.50%	1.16%	1.84%	2.29%
15+	0.37%	1.16%	1.53%	1.91%

Additional multiplier to apply to Lapse Rates for Gender	
Gender	Multiplier
Female	82.5%
Male	140.0%

Voluntary lapse assumptions include an NFO conversion rate which is calculated as 19% of the requested rate increase, adjusted to reflect the effect of the Nationwide rate increase implemented as of 10/31/2018, and capped at 19%.

For policies with an active ROP rider, an additional shock lapse rate of 10% is assumed in addition to the above-noted lapsed rates at durations 11, 21, 31, etc.

**D. Morbidity Rates**

The morbidity assumptions are based on a combination of the Company’s historical claim experience on these forms from 2009 through 6/30/2018, the Milliman *2017 Long-Term Care Guidelines (Guidelines)* and judgment. The claim cost assumptions reflect the Company’s current best estimate of future morbidity. In setting the morbidity assumptions, the policy design, underwriting and claim adjudication practices have been taken into consideration. The baseline assumptions do not include any adverse selection resulting from the rate increase, loads for moderately adverse experience, or future morbidity improvement.

**E. Claim Reserves**

The incurred claims shown in the Nationwide historical experience include paid claims, DLR, ICOS, and IBNR.

**F. Expenses**

The experience used to determine the rate increase need uses the following expense assumptions, consistent with the expense assumption in place at the time of the prior rate increase:

- Premium Tax – 2.5% of Paid Premium
- Maintenance Expense – \$155 per insured with 2.0% inflation per year
- Claim Expense – 3.5% of Base Paid Claims
- Commissions – 16.0% of Paid Premium at the Original Premium Rate Level for 440 Series;  
5.0% of Paid Premium at the Original Premium Rate Level for 460 Series

#### **G. Non-forfeiture (NFO) Residual Liability**

The residual NFO liability captures the future claims expected to be incurred on policies which elect the non-forfeiture benefit. These percentages are reflected in the projected future experience after the proposed rate increase in **Exhibit 3a** through **Exhibit 3c**.

#### **VI. Rate Increase History**

Prior approved rate increases for these policy forms in this state are summarized in **Appendix A**.

#### **VII. Effective Date**

Policyholder notification of the rate increases will begin as soon as possible subject to state insurance department approval with the additional condition that no policyholder will receive the rate increases sooner than one year after receiving a previous rate increase.

#### **VIII. Premium Profile**

The state-specific average total annualized premiums, per insured (including riders), before and after the requested premium rate increases are shown in **Appendix A**.

#### **IX. Historical and Projected Future Experience**

Exhibit 2 presents Nationwide experience since inception by “incurred year,” or “loss year,” for these policy forms and riders as of 10/31/2018. Future experience has been projected for 2018 and every year thereafter, as presented in Exhibit 3a through Exhibit 3c. In these exhibits, please note that the paid claims have been discounted with interest from the claim payment date back to the incurred date of the claim.

The Nationwide historical and projected experience adjusted to reflect the State’s specific rate increase history, both with and without the impact of the justified rate increase, is contained in Exhibit 3a through Exhibit 3c. Projected experience utilizes best estimate assumptions. Experience with the impact of the justified rate increase includes the impact of the justified rate increase and resulting shock lapse and NFO residual liability given implementation of the rate increase on 7/1/2020. The present values of earned premium and incurred claims are discounted at 5.0%. The lifetime anticipated loss ratio is defined as the present value of the historical and projected future claims divided by the present value of the historical and projected future earned premiums.

#### **X. Summary of Appendices**

Multiple Appendices have been included with this filing. They are detailed below.

**Appendix A** contains information that is specific to the state in which this filing is made, such as the average annual premium, the number of policyholders inforce, etc. Similar information for Nationwide is also contained in this Appendix.

**Appendix B** contains a summary of the benefits included under each policy form grouping.

**Appendix C** contains a summary of the demographic distributions for inforce policies issued Nationwide and on State-level as of 10/31/2018.

**Appendix D** contains a detailed summary of the development of the projection assumptions.

**Appendix E** contains a comparison of the actual total termination rates to both the original pricing assumptions and current assumptions.

## **XI. Summary of Exhibits**

Multiple Exhibits have been included with this filing. They are detailed below.

**Exhibit 1** contains the breakdown of policy counts, annualized premium, and average premium for all inforce policies by state under these products. This is shown for all policies, policies with active inflation riders, and policies without active inflation riders.

**Exhibit 2** contains the historical Nationwide experience for all policies issued under these products by calendar year and duration. The presented experience excludes the ROP rider.

**Exhibit 3a** contains historical and projected Nationwide experience, where the Nationwide values have been adjusted to State-specific levels, for all policies issued under these products. The exhibit also includes the projected lifetime loss ratios both with and without the impact of the justified rate increase for these policies. The presented experience excludes the ROP rider.

**Exhibit 3b** contains historical and projected Nationwide experience, where the Nationwide values have been adjusted to State-specific levels, for all policies in a paid-up status issued under these products. The exhibit also includes the projected lifetime loss ratios both with and without the impact of the justified rate increase for these policies. The presented experience excludes the ROP rider.

**Exhibit 3c** contains historical and projected Nationwide experience, where the Nationwide values have been adjusted to State-specific levels, for all policies in a premium paying status issued under these products. The exhibit also includes the projected lifetime loss ratios both with and without the impact of the justified rate increase for these policies. The presented experience excludes the ROP rider.

**Exhibit 4** contains historical and projected Pennsylvania experience for all policies issued under these products. The exhibit also includes the projected lifetime loss ratios both with and without the impact of the justified rate increase for these policies. The presented experience excludes the ROP rider.

## **XII. Actuarial Certification**

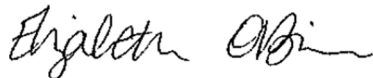
To the best of my knowledge and judgment this rate filing is in compliance with the applicable laws and regulations of this State as they relate to premium rate developments and revisions. This memorandum complies with all applicable Actuarial Standards of Practice, including Actuarial Standards of Practice No. 8 "Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health Benefits," No. 18 "Long-Term Care Insurance," and No. 23 "Data Quality."

In performing the analysis, preparing this filing, and rendering the actuarial opinion below, I relied upon other actuaries for experience analysis used to develop baseline actuarial assumptions related to morbidity and persistency. I reviewed the analysis for reasonableness and consistency, but I did not perform a detailed audit. The assumptions are appropriate for the purpose used.

I relied on data provided to me by United Health Actuarial Services. I reviewed the data for reasonableness and consistency, but I did not perform a detailed audit of the data. Based on my review of the data, the data are appropriate for the purpose used, and to the best of my knowledge the data contain no material data quality issues.

I have reviewed and taken into consideration the policy design and coverage provided, and the Company's original underwriting and claims adjudication processes.

In my opinion, the rates are not excessive or unfairly discriminatory. The anticipated lifetime loss ratio exceeds the applicable required loss ratio. The filing will enhance premium adequacy but may not be sufficient to prevent future rate action. Given this, I cannot certify the proposed rates to be sustainable over the lifetime of the form with no future premium increases or that they would be sufficient to cover anticipated costs under moderately adverse conditions.



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Elizabeth A. O'Brien, FSA, MAAA  
Associate Actuary  
Continental General Insurance Company  
11001 Lakeline Blvd, Suite 120  
Austin, Texas 78717



**Appendix A**

**Continental General Insurance Company  
Individual Long Term Care Insurance Policy Forms:  
440 Series et al.**

**Pennsylvania**

Requested Base Rate Increase: 42.0%

Requested IGR Load Increase: 243.0%

**1. Pennsylvania Lives Affected by Requested Rate Increase (Section III in Actuarial Memorandum)**

Total Pennsylvania lives affected by this filing:	42
Pennsylvania lives with an active Inflation Guard Rider affected by this filing:	35

**2. Issue Date Range (for policies currently in-force)**

Pennsylvania	1/28/1999 to 11/27/2002
Nationwide	4/1/1996 to 8/7/2003

**3. Pennsylvania Rate Increase History (Section VI in Actuarial Memorandum)**

Base Rate History	
Form 440	45.0% in 2002, 41.0% in 2004, 14.1%** in 2009, 15.0% in 2011, 15.0% in 2012, 20.0% in 2015, 7.2% in 2018

\*\*Please note, Pennsylvania approved a 15% rate increase in 2009. Pennsylvania requested that 2 policies be excluded from the prior rate increase. As a result, the average increase from the 2009 rate filing was equal to 14.1%. Due to an administrative oversight the company implemented the average increase instead of the amount approved by the state. Due to the relatively small size of the in force block in Pennsylvania and to limit policyholder confusion, the Company elected to forgo implementing a second increase in order to bring the total increase up to 15%.

**4. Premium Profile (Section VIII in Actuarial Memorandum)**

The average annual premium for this form and associated riders, prior to the rate increase, is:

Policies without an active Inflation Guard Rider:		Policies with an active Inflation Guard Rider:	
Pennsylvania	\$4,605	Pennsylvania	\$3,695
Nationwide	\$3,199	Nationwide	\$3,438

The average annual premium for this form and associated riders, after the rate increase, is:

Policies without an active Inflation Guard Rider:		Policies with an active Inflation Guard Rider:	
Pennsylvania	\$6,539	Pennsylvania	\$9,972

**Continental General Insurance Company**  
**Appendix B**  
**Policy Forms: 440 Series et al.**  
**Description of Benefits**

Product Series 440						
440	Qualified Facility Only Long-Term Care with Optional HHC Rider	Indemnity	Reimbursement	2, 4 years, Lifetime	0, 30, 100 days	1, 2, 3, 4, 5
442	Comprehensive Long-Term Care	Indemnity	Reimbursement	2, 4 years, Lifetime	0, 30, 100 days	2, 5, 6, 12
443	Qualified Comprehensive Long-Term Care	Indemnity	Reimbursement	\$ 50K, \$ 100K, \$ 250K, Unlimited	0, 30, 90 days	2, 3, 5
444	Qualified Facility Only Long-Term Care	Indemnity	None	\$ 50K, \$ 100K, \$ 250K, Unlimited	0, 30, 90 days	2, 3, 5
445	Facility Only Long-Term Care with Optional HHC Rider	Indemnity	Reimbursement	2, 4 years, Lifetime	0, 30, 100 days	2, 5, 7, 12
446	Qualified Facility Only Long-Term Care with Optional HHC Rider	Indemnity	Reimbursement	2, 4 years, Lifetime	0, 30, 100 days	2, 5, 7, 12
449	Qualified Comprehensive Long-Term Care	Indemnity	Reimbursement	\$ 100K, \$ 250K, Unlimited	0, 20, 90 days	1 -50% addl HHC, 2
Product Series 460						
460	Comprehensive Long-Term Care	Reimbursement	Reimbursement	\$ 75K, \$150K, \$ 250K, \$ 500K, Unlimited	0, 30, 100, 180 days	2, 3, 4, 5, 8, 9, 10
461	Basic Long-Term Care	Reimbursement	Reimbursement	\$ 75K, \$150K, \$ 250K, \$ 500K, Unlimited	0, 30, 100, 180 days	2, 3, 4, 5, 8, 10, 11
462	Qualified Comprehensive Long-Term Care	Reimbursement	Reimbursement	\$ 75K, \$150K, \$ 250K, \$ 500K, Unlimited	0, 30, 100, 180 days	2, 3, 4, 5, 8, 9, 10
470	Non-Qualified Home Health Care Only	None	Reimbursement	\$ 75K, \$150K, \$ 250K, \$ 500K, Unlimited	0, 30, 100, 180 days	2, 3, 4, 5, 8, 11
471	Qualified Home Health Care Only	None	Reimbursement	\$ 75K, \$150K, \$ 250K, \$ 500K, Unlimited	0, 30, 100, 180 days	2, 3, 4, 5, 8, 11

Riders:

- 1 Home Health Care
- 2 Inflation guard
- 3 Return of Premium
- 4 Guaranteed Purchase Option
- 5 Non-Forfeiture Rider
- 6 Community Care
- 7 Home and Community Care
- 8 Spousal Access Rider
- 9 Survivorship Benefit Endorsement
- 10 Tax Qualified Amendment Rider
- 11 Survivorship Benefit Rider
- 12 Premium Accrual Rider

\* At issue, the insured chooses the daily benefit limit, the elimination period, and the maximum benefit period, as well as any optional riders.

## Appendix C

### Continental General Insurance Company Distribution of Inforce Business as of October 31, 2018 Policy Forms: 440 Series et al.

Continental General Insurance Company Demographics Distribution of Inforce Business as of 10/31/2018 All Policies - PA				
Issue Year	Count	% of Count	Premium	% of Premium
1996	-	0%	-	0%
1997	-	0%	-	0%
1998	-	0%	-	0%
1999	25	46%	72,631	45%
2000	14	26%	50,166	31%
2001	10	19%	22,457	14%
2002	5	9%	16,316	10%
2003	-	0%	-	0%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Continental General Insurance Company Demographics Distribution of Inforce Business as of 10/31/2018 All Policies - Nationwide				
Issue Year	Count	% of Count	Premium	% of Premium
1996	1	0%	6,281	0%
1997	63	2%	192,086	3%
1998	693	25%	1,696,948	24%
1999	500	18%	1,292,181	18%
2000	527	19%	1,248,760	18%
2001	598	22%	1,580,405	23%
2002	341	12%	942,767	13%
2003	18	1%	25,382	0%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Issue Age	Count	% of Count	Premium	% of Premium
<45	1	2%	2,869	2%
45-49	1	2%	3,500	2%
50-54	19	35%	38,707	24%
55-59	19	35%	47,071	29%
60-64	6	11%	13,685	8%
65-69	4	7%	22,691	14%
70-74	3	6%	24,224	15%
75-80	1	2%	8,824	5%
80+	-	0%	-	0%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Issue Age	Count	% of Count	Premium	% of Premium
<45	30	1%	53,408	1%
45-49	83	3%	154,451	2%
50-54	302	11%	611,629	9%
55-59	649	24%	1,401,465	20%
60-64	842	31%	2,031,131	29%
65-69	535	20%	1,597,177	23%
70-74	237	9%	867,033	12%
75-80	57	2%	251,366	4%
80+	6	0%	17,150	0%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Attained Age	Count	% of Count	Premium	% of Premium
<45	-	0%	-	0%
45 - 49	-	0%	-	0%
50 - 54	-	0%	-	0%
55 - 59	1	2%	2,869	2%
60 - 64	-	0%	-	0%
65 - 69	4	7%	12,355	8%
70 - 74	18	33%	33,321	21%
75 - 79	19	35%	43,972	27%
80+	12	22%	69,054	43%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Attained Age	Count	% of Count	Premium	% of Premium
<45	-	0%	-	0%
45 - 49	1	0%	-	0%
50 - 54	2	0%	938	0%
55 - 59	10	0%	10,746	0%
60 - 64	30	1%	58,896	1%
65 - 69	100	4%	209,207	3%
70 - 74	323	12%	677,577	10%
75 - 79	676	25%	1,466,836	21%
80+	1,599	58%	4,560,611	65%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Gender	Count	% of Count	Premium	% of Premium
Female	31	57%	98,148	61%
Male	23	43%	63,422	39%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Gender	Count	% of Count	Premium	% of Premium
Female	1,664	61%	4,016,199	57%
Male	1,077	39%	2,968,612	43%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Inflation Options	Count	% of Count	Premium	% of Premium
None	19	35%	32,234	20%
GPO/COLI	-	0%	-	0%
5% Compound Lifetime	35	65%	129,337	80%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Inflation Options	Count	% of Count	Premium	% of Premium
None	1,513	55%	2,677,694	38%
GPO/COLI	59	2%	287,809	4%
5% Compound Lifetime	1,169	43%	4,019,307	58%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Continental General Insurance Company Demographics Distribution of Inforce Business as of 10/31/2018 All Policies - PA				
Limited Payment Options	Count	% of Count	Premium	% of Premium
5 Pay	-	0%	-	0%
10 Pay	-	0%	-	0%
Lifetime	54	100%	161,571	100%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Elimination Period Days	Count	% of Count	Premium	% of Premium
0	26	48%	97,673	60%
20	-	0%	-	0%
30	13	24%	25,540	16%
90	-	0%	-	0%
100	15	28%	38,357	24%
180	-	0%	-	0%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Benefit Period	Count	% of Count	Premium	% of Premium
0 - 1 years	12	22%	-	0%
1 - 2 years	-	0%	-	0%
2 - 3 years	10	19%	31,005	19%
3 - 4 years	-	0%	-	0%
4 - 5 years	11	20%	33,111	20%
5 - 6 years	-	0%	-	0%
6 - 7 years	-	0%	-	0%
7 - 8 years	-	0%	-	0%
Lifetime	21	39%	97,454	60%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Marital Status	Count	% of Count	Premium	% of Premium
Single	15	28%	56,571	35%
Married	39	72%	105,000	65%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

HHC Percent	Count	% of Count	Premium	% of Premium
<0.5	25	46%	72,442	45%
0.5-0.75	13	24%	26,751	17%
0.75-1	3	6%	5,755	4%
1-1.25	13	24%	56,623	35%
1.25-1.5	-	0%	-	0%
>1.5	-	0%	-	0%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Tax Status	Count	% of Count	Premium	% of Premium
NTQ	-	0%	-	0%
TQ	54	100%	161,571	100%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Premium-paying Status	Count	% of Count	Premium	% of Premium
Y	42	78%	161,571	100%
N	12	22%	-	0%
<b>Total</b>	<b>54</b>	<b>100%</b>	<b>161,571</b>	<b>100%</b>

Continental General Insurance Company Demographics Distribution of Inforce Business as of 10/31/2018 All Policies - Nationwide				
Limited Payment Options	Count	% of Count	Premium	% of Premium
5 Pay	1	0%	-	0%
10 Pay	7	0%	-	0%
Lifetime	2,733	100%	6,984,810	100%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Elimination Period Days	Count	% of Count	Premium	% of Premium
0	529	19%	1,348,700	19%
20	19	1%	54,369	1%
30	582	21%	1,600,765	23%
90	535	20%	1,238,014	18%
100	789	29%	1,984,779	28%
180	287	10%	758,183	11%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Benefit Period	Count	% of Count	Premium	% of Premium
0 - 1 years	647	24%	140,679	2%
1 - 2 years	56	2%	23,396	0%
2 - 3 years	149	5%	380,785	5%
3 - 4 years	48	2%	173,589	2%
4 - 5 years	234	9%	715,138	10%
5 - 6 years	65	2%	194,597	3%
6 - 7 years	114	4%	344,786	5%
7 - 8 years	14	1%	59,810	1%
Lifetime	1,414	52%	4,952,030	71%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Marital Status	Count	% of Count	Premium	% of Premium
Single	641	23%	1,877,981	27%
Married	2,100	77%	5,106,829	73%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

HHC Percent	Count	% of Count	Premium	% of Premium
<0.5	350	13%	793,491	11%
0.5-0.75	1,070	39%	2,568,894	37%
0.75-1	124	5%	303,897	4%
1-1.25	1,197	44%	3,318,528	48%
1.25-1.5	-	0%	-	0%
>1.5	-	0%	-	0%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Tax Status	Count	% of Count	Premium	% of Premium
NTQ	882	32%	2,325,450	33%
TQ	1,859	68%	4,659,360	67%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

Premium-paying Status	Count	% of Count	Premium	% of Premium
Y	2,096	76%	6,984,810	100%
N	645	24%	-	0%
<b>Total</b>	<b>2,741</b>	<b>100%</b>	<b>6,984,810</b>	<b>100%</b>

**Continental General Insurance Company**  
**Appendix D**  
**Actuarial Assumption Development**

Appendix D contains a description of the experience studies conducted on the Company's actual experience.

**Termination Study**

A study was conducted on the Company's actual termination experience from 2002 to 6/30/2018 on forms issued by Continental General Insurance Company. The study measured total termination rates.

The future expected voluntary lapse assumptions were developed based on the historical implied lapse experience and judgment. Historical implied lapses were determined by subtracting expected deaths and actual benefit exhaustions from total terminations. The expected voluntary lapse rates vary by inflation option, spousal discount, gender, and policy duration. Expected deaths were calculated assuming mortality is equal to 100% of the Individual Annuity Mortality (IAM) 2012 Basic table with mortality steepening factors, mortality improvement, and selection factors applied. This mortality assumption, including selection factors and mortality improvement, is based on industry expectations.

Exhibit D-1 contains the comparison of implied lapse experience to the current lapse assumptions. The Exhibit shows total lives, actual total terminations and expected deaths. The voluntary lapse rates are shown as described above, as historical implied lapses and expected lapses.

**Morbidity Study**

A morbidity study was also conducted on the Company's actual experience from 2009 to 6/30/2018 on forms issued by Continental General Insurance Company. Actual claims were measured against the Milliman 2017 Long Term Care Guidelines (Guidelines). Actual-to-expected fitting factors were developed based on the actual experience and judgment.

Actual incurred claims are based on paid claims and remaining claim reserves discounted (using an interest rate of 4.5% for this experience study) back to the claim incurred date. The claim reserves were discounted from valuation date to the claim incurred date using a 4.5% discount rate and excluding any waiver of premium load, LAE load and explicit margin. Actual claims include approximately \$22 million of Incurred But Not Reported reserve (IBNR) as of June 30, 2018, which is allocated to incurred year as follows: approximately 84.5% to incurred year 2018 and 15.5% to incurred year 2017. Actual incurred claims are calculated by adding together the present value of paid claims and claim reserves. Actual average claim severity was calculated by dividing actual incurred claims by the count of claims. In this study, waiver of premium was excluded from both the actual claims and expected claims.

Expected claims were based on the *Guidelines* and include selection factors and actual-to-expected fitting factors. The actual-to-expected fitting factors varied by coverage type, benefit period, payment type, marital status, and form. No future morbidity improvement is assumed.

Exhibit D-2 contains the comparison of actual claim experience to the current assumptions for the policy form included in this filing.

**Continental General Insurance Company**  
**Appendix D**  
**Exhibit D-1**  
**Termination Study**

**Experience by Policy Duration**

Policy Duration	Total Lives	Total Terminations		Mortality Rate Expected	Voluntary Lapse Rate	
		Count	Rate		Implied	"Current"
1	1,975	476	24.1%	0.3%	23.8%	23.8%
2	3,842	796	20.7%	0.6%	20.2%	19.4%
3	5,291	680	12.9%	0.7%	12.2%	11.5%
4	6,980	652	9.3%	0.7%	8.6%	8.6%
5	9,831	631	6.4%	0.9%	5.6%	5.6%
6	11,978	676	5.6%	1.0%	4.6%	4.7%
7	15,171	738	4.9%	1.1%	3.7%	4.3%
8	16,199	709	4.4%	1.3%	3.0%	3.4%
9	15,971	648	4.1%	1.5%	2.5%	2.8%
10	15,436	762	4.9%	1.6%	3.2%	2.4%
11	14,594	615	4.2%	1.8%	2.3%	2.0%
12	13,844	479	3.5%	2.0%	1.4%	1.7%
13	13,158	530	4.0%	2.2%	1.7%	1.5%
14	12,302	478	3.9%	2.4%	1.3%	1.2%
15	11,583	528	4.6%	2.8%	1.7%	1.1%
16	10,686	488	4.6%	3.1%	1.3%	1.0%
17	9,604	449	4.7%	3.5%	1.0%	1.0%
18	8,458	426	5.0%	3.8%	1.0%	1.0%
19	7,090	425	6.0%	4.4%	1.4%	1.0%
20+	11,068	760	6.9%	5.5%	1.0%	1.0%
<b>Total</b>	<b>215,061</b>	<b>11,946</b>	<b>5.6%</b>	<b>2.1%</b>	<b>3.3%</b>	<b>3.3%</b>

**Notes:**

- 1) Experience from 2002 through 6/30/2018.
- 2) Expected Mortality Rate is 100% of the Individual Annuity Mortality (IAM) 2012 Basic Table with mortality steepening factors applied, historical mortality improvement, and selection factors.
- 3) Implied Voluntary Lapse Rate is the Total Termination Rate minus the Expected Mortality Rate minus the Actual Benefit Exhaust Rate.
- 4) Current Voluntary Lapse Rate is the current projection assumption.  
 Since these vary by inflation benefit option, spousal discount, and gender the rates shown above are composites.  
 The ultimate lapse rate begins in duration 15.
- 5) Includes only lifetime pay policies (excludes 5 Pay and 10 Pay).

**Continental General Insurance Company**  
**Appendix D**  
**Exhibit D-2**  
**Policy Forms: 440 Series et al.**  
**Claim Study**

**Experience by Policy Duration**

<b>Policy Duration</b>	<b>Total Lives</b>	<b>Actual Claim Count</b>	<b>Actual Incurred Claims</b>	<b>Expected Incurred Claims</b>	<b>Actual to Expected</b>
6	7	0	0	6,795	0.0%
7	274	7	314,056	330,101	95.1%
8	1,015	16	1,890,370	1,345,989	140.4%
9	1,798	23	1,372,191	2,392,678	57.3%
10	2,243	44	3,382,796	2,882,997	117.3%
11	2,941	57	4,054,841	3,818,793	106.2%
12	3,438	62	6,203,106	4,984,760	124.4%
13	3,330	81	6,220,684	5,309,147	117.2%
14	3,203	55	4,656,334	5,736,731	81.2%
15	3,083	70	7,038,151	6,227,893	113.0%
16	2,916	89	7,808,716	6,622,003	117.9%
17	2,485	64	7,975,376	6,336,590	125.9%
18	1,846	53	3,493,055	5,277,063	66.2%
19	1,279	38	5,319,138	4,181,071	127.2%
20+	885	29	3,153,479	3,486,596	90.4%
<b>Total</b>	<b>30,741</b>	<b>688</b>	<b>62,882,293</b>	<b>58,939,208</b>	<b>106.7%</b>

**Experience by Calendar Year**

<b>Calendar Year</b>	<b>Total Lives</b>	<b>Actual Claim Count</b>	<b>Actual Incurred Claims</b>	<b>Expected Incurred Claims</b>	<b>Actual to Expected</b>
2009	3,989	65	5,939,352	4,896,819	121.3%
2010	3,761	64	4,088,913	5,127,224	79.7%
2011	3,516	82	7,400,467	5,077,401	145.8%
2012	3,358	80	6,042,552	5,460,156	110.7%
2013	3,209	62	5,220,038	5,854,865	89.2%
2014	3,088	64	6,816,742	6,319,447	107.9%
2015	2,953	86	8,123,723	6,718,443	120.9%
2016	2,823	67	6,686,287	7,246,320	92.3%
2017	2,715	84	9,090,595	7,903,433	115.0%
2018	1,328	34	3,473,623	4,335,101	80.1%
<b>Total</b>	<b>30,741</b>	<b>688</b>	<b>62,882,293</b>	<b>58,939,208</b>	<b>106.7%</b>

**Notes:**

- 1) Experience from 2009 through 6/30/2018
- 2) Actual incurred claims are defined as the sum of paid claims and reserves.  
 Paid claims represent the present value of paid claims discounted to the claim incurred date.  
 Reserve amounts represent the present value of the remaining claim reserve (including IBNR) discounted to the claim incurred date.
- 3) Expected Claims are based on the Milliman 2017 *Long-Term Care Guidelines* (including Product Factors)
- 4) Claim dollar amounts are discounted using a 4.50% interest rate (both actual and expected).

**Continental General Insurance Company**  
**Appendix E**  
**Policy Forms: 440 Series et al.**  
**Policy Persistency Comparison**

Policy Duration	<u>Actual Experience</u>		<u>Original Pricing Assumptions</u>		<u>Current Assumptions</u>		
	Total Lives	Total Terminations	Total Terminations	Lapse	Mortality	Benefit Exhaustion	Total Terminations
1	1,568	25.9%	17.5%	23.8%	0.4%	0.0%	24.0%
2	3,262	22.7%	14.5%	19.3%	0.6%	0.0%	19.8%
3	3,945	13.8%	11.5%	11.5%	0.7%	0.0%	12.2%
4	4,361	10.0%	9.3%	8.6%	0.8%	0.0%	9.4%
5	5,361	7.0%	8.3%	5.6%	1.0%	0.0%	6.5%
6	5,128	6.4%	8.4%	4.7%	1.1%	0.0%	5.7%
7	4,804	6.0%	8.4%	4.3%	1.2%	0.1%	5.5%
8	4,518	6.1%	8.5%	3.3%	1.4%	0.1%	4.7%
9	4,233	4.7%	8.6%	2.7%	1.5%	0.0%	4.2%
10	3,972	4.7%	8.7%	2.3%	1.6%	0.1%	3.9%
11	3,682	4.0%	8.8%	1.9%	1.7%	0.1%	3.7%
12	3,434	3.8%	8.9%	1.7%	1.9%	0.0%	3.5%
13	3,226	4.1%	9.0%	1.4%	2.0%	0.1%	3.5%
14	2,968	4.1%	9.1%	1.2%	2.2%	0.2%	3.6%
15	2,794	3.9%	9.3%	1.0%	2.5%	0.1%	3.6%
16	2,519	4.3%	9.4%	1.0%	2.8%	0.0%	3.8%
17	2,037	4.4%	9.6%	0.9%	3.1%	0.1%	4.1%
18+	2,968	4.9%	9.8%	0.9%	3.5%	0.1%	4.4%

Notes:

- 1) Experience is 2002 through 6/30/18.
- 2) The "Original Pricing Assumptions" are those provided in the original pricing Actuarial Memorandum.
- 3) Since Lapse Rates vary by inflation benefit option, spousal discount, and gender, the rates shown above are composites.  
The ultimate lapse rate starts in duration 15.
- 4) The mortality assumptions are 100% of the Individual Annuity Mortality (IAM) 2012 Basic Table with mortality steepening factors applied, historical mortality improvement, and selection factors.
- 5) Benefit Exhaustion rates are based on actual experience.
- 6) The results shown above include only lifetime pay policies (excludes 5 pay, 10 pay).



## Exhibit 1

### Continental General Insurance Company Policy Forms: 440 Series et al. Nationwide Premium Paying Lives As of 10/31/2018

Issue State	Combined			Lives with Active Inflation			Lives without Active Inflation		
	Lives	Annualized Premium	Average Premium	Lives	Annualized Premium	Average Premium	Lives	Annualized Premium	Average Premium
AL	31	127,170	4,102	10	41,898	4,190	21	85,272	4,061
AR	11	32,673	2,970	3	15,621	5,207	8	17,052	2,131
AZ	4	13,997	3,499	2	9,142	4,571	2	4,855	2,427
CO	48	168,784	3,516	23	103,795	4,513	25	64,990	2,600
GA	33	99,564	3,017	12	37,291	3,108	21	62,273	2,965
IA	321	966,243	3,010	250	769,151	3,077	71	197,092	2,776
ID	2	3,841	1,921	0	0	0	2	3,841	1,921
IL	100	493,501	4,935	45	261,928	5,821	55	231,573	4,210
IN	30	56,551	1,885	18	30,988	1,722	12	25,563	2,130
KS	74	215,182	2,908	48	149,722	3,119	26	65,460	2,518
KY	88	247,015	2,807	15	51,294	3,420	73	195,721	2,681
LA	17	41,538	2,443	3	11,036	3,679	14	30,502	2,179
MI	13	132,790	10,215	4	62,596	15,649	9	70,194	7,799
MN	464	1,153,031	2,485	314	830,803	2,646	150	322,228	2,148
MO	56	184,900	3,302	38	133,272	3,507	18	51,628	2,868
MS	58	290,904	5,016	1	9,265	9,265	57	281,639	4,941
MT	12	34,454	2,871	5	18,639	3,728	7	15,816	2,259
NC	51	106,254	2,083	15	35,252	2,350	36	71,002	1,972
NE	164	579,089	3,531	104	358,432	3,446	60	220,657	3,678
NM	1	1,879	1,879	0	0	0	1	1,879	1,879
NV	4	13,547	3,387	4	13,547	3,387	0	0	0
OH	78	352,368	4,518	36	198,898	5,525	42	153,470	3,654
OK	37	108,860	2,942	14	38,735	2,767	23	70,125	3,049
PA	42	161,571	3,847	35	129,337	3,695	7	32,234	4,605
SC	19	80,481	4,236	4	23,947	5,987	15	56,534	3,769
SD	15	114,002	7,600	4	16,239	4,060	11	97,763	8,888
TN	106	479,973	4,528	27	184,880	6,847	79	295,093	3,735
TX	29	79,021	2,725	15	49,953	3,330	14	29,068	2,076
UT	1	1,737	1,737	1	1,737	1,737	0	0	0
VA	16	36,554	2,285	13	24,309	1,870	3	12,245	4,082
WI	152	516,524	3,398	100	375,412	3,754	52	141,112	2,714
WV	13	65,638	5,049	2	15,287	7,643	11	50,351	4,577
WY	6	25,175	4,196	4	16,904	4,226	2	8,271	4,136
<b>Total</b>	<b>2,096</b>	<b>6,984,810</b>	<b>3,332</b>	<b>1,169</b>	<b>4,019,307</b>	<b>3,438</b>	<b>927</b>	<b>2,965,503</b>	<b>3,199</b>

Exhibit 2

Continental General Insurance Company  
 Policy Forms: 440 Series et al.  
 Nationwide Historic Experience by Calendar and Issue Year

Calendar Year	Issue Year	Premium	Paid Claims	Reserves	IBNR	Total Incurred Claims	Loss Ratio	Calendar Year Duration
1997	1997	42,468	0	0	0	0	0.0%	1
1998	1997	36,296	0	0	0	0	0.0%	2
1998	1998	1,396,786	218,801	0	0	218,801	15.7%	1
1999	1997	33,217	8,511	0	0	8,511	25.6%	3
1999	1998	1,384,417	260,720	0	0	260,720	18.8%	2
1999	1999	1,796,067	0	0	0	0	0.0%	1
2000	1997	35,227	22,514	0	0	22,514	63.9%	4
2000	1998	1,295,544	884,977	0	0	884,977	68.3%	3
2000	1999	1,775,633	0	0	0	0	0.0%	2
2000	2000	1,515,845	0	0	0	0	0.0%	1
2001	1997	34,677	89,497	0	0	89,497	258.1%	5
2001	1998	1,299,584	1,040,639	0	0	1,040,639	80.1%	4
2001	1999	1,719,478	119,599	0	0	119,599	7.0%	3
2001	2000	1,623,321	265,491	0	0	265,491	16.4%	2
2001	2001	2,206,331	147,078	0	0	147,078	6.7%	1
2002	1997	21,012	38,968	0	0	38,968	185.5%	6
2002	1998	1,027,959	601,229	0	0	601,229	58.5%	5
2002	1999	1,816,376	301,434	0	0	301,434	16.6%	4
2002	2000	1,370,717	720,601	0	0	720,601	52.6%	3
2002	2001	2,684,497	276,588	0	0	276,588	10.3%	2
2002	2002	1,706,558	73,418	0	0	73,418	4.3%	1
2003	1997	41,426	194,483	0	0	194,483	469.5%	7
2003	1998	1,186,521	1,646,216	0	0	1,646,216	138.7%	6
2003	1999	1,732,608	605,905	0	0	605,905	35.0%	5
2003	2000	1,343,516	641,310	0	0	641,310	47.7%	4
2003	2001	2,004,477	833,519	14,818	0	848,337	42.3%	3
2003	2002	1,728,767	604,883	43,167	0	648,050	37.5%	2
2003	2003	841,852	0	0	0	0	0.0%	1
2004	1997	42,525	0	0	0	0	0.0%	8
2004	1998	1,341,022	1,621,425	0	0	1,621,425	120.9%	7
2004	1999	1,996,729	583,159	0	0	583,159	29.2%	6
2004	2000	1,368,542	643,426	0	0	643,426	47.0%	5
2004	2001	2,080,956	1,290,894	210,777	0	1,501,672	72.2%	4
2004	2002	1,640,566	302,116	0	0	302,116	18.4%	3
2004	2003	661,507	0	0	0	0	0.0%	2
2004	2004	16,038	0	0	0	0	0.0%	1
2005	1997	43,146	12,626	0	0	12,626	29.3%	9
2005	1998	1,527,149	1,513,080	0	0	1,513,080	99.1%	8
2005	1999	2,195,928	243,883	0	0	243,883	11.1%	7
2005	2000	1,460,377	519,715	0	0	519,715	35.6%	6
2005	2001	2,139,444	596,869	0	0	596,869	27.9%	5
2005	2002	1,662,067	327,220	0	0	327,220	19.7%	4
2005	2003	641,132	0	0	0	0	0.0%	3
2005	2004	9,781	0	0	0	0	0.0%	2
2006	1997	40,985	0	0	0	0	0.0%	10
2006	1998	1,484,414	1,837,906	156,176	0	1,994,082	134.3%	9
2006	1999	2,268,563	133,702	0	0	133,702	5.9%	8
2006	2000	1,448,816	366,325	0	0	366,325	25.3%	7
2006	2001	2,106,129	1,807,586	105,022	0	1,912,608	90.8%	6
2006	2002	1,647,092	572,572	0	0	572,572	34.8%	5
2006	2003	601,531	1,671	0	0	1,671	0.3%	4
2006	2004	11,963	0	0	0	0	0.0%	3
2007	1997	38,602	43,317	0	0	43,317	112.2%	11
2007	1998	1,439,231	1,721,748	0	0	1,721,748	119.6%	10
2007	1999	2,179,545	335,325	51,691	0	387,017	17.8%	9
2007	2000	1,417,214	1,093,115	0	0	1,093,115	77.1%	8
2007	2001	2,052,676	785,772	53,353	0	839,124	40.9%	7
2007	2002	1,602,062	65,799	0	0	65,799	4.1%	6
2007	2003	578,763	0	0	0	0	0.0%	5
2007	2004	9,275	0	0	0	0	0.0%	4
2008	1997	42,263	24,511	0	0	24,511	58.0%	12
2008	1998	1,391,397	2,528,488	0	0	2,528,488	181.7%	11
2008	1999	1,959,680	441,385	0	0	441,385	22.5%	10
2008	2000	1,344,358	671,777	0	0	671,777	50.0%	9
2008	2001	1,892,585	357,394	0	0	357,394	18.9%	8
2008	2002	1,533,164	592,914	0	0	592,914	38.7%	7
2008	2003	534,505	2,546	0	0	2,546	0.5%	6
2008	2004	15,139	0	0	0	0	0.0%	5
2009	1997	219,039	471,544	219,395	0	690,940	315.4%	13
2009	1998	2,269,083	2,257,703	0	0	2,257,703	99.5%	12
2009	1999	1,378,776	610,493	0	0	610,493	44.3%	11
2009	2000	1,585,474	1,614,698	0	0	1,614,698	101.8%	10
2009	2001	1,782,615	1,422,388	110,600	0	1,532,988	86.0%	9
2009	2002	1,099,784	683,342	112,787	0	796,128	72.4%	8
2009	2003	65,988	6,916	0	0	6,916	10.5%	7
2009	2004	0	0	0	0	0	0.0%	6
2010	1997	169,436	231,716	19,648	0	251,364	148.4%	14
2010	1998	1,987,772	1,329,426	0	0	1,329,426	66.9%	13
2010	1999	1,323,542	369,321	0	0	369,321	27.9%	12
2010	2000	1,505,040	623,761	0	0	623,761	41.4%	11
2010	2001	1,707,033	1,035,207	0	0	1,035,207	60.6%	10
2010	2002	1,011,143	821,797	174,524	0	996,321	98.5%	9
2010	2003	60,080	3,560	0	0	3,560	5.9%	8
2010	2004	0	0	0	0	0	0.0%	7
2011	1997	208,424	114,005	0	0	114,005	54.7%	15
2011	1998	2,185,439	2,153,006	0	0	2,153,006	98.5%	14

**Exhibit 2**

**Continental General Insurance Company  
Policy Forms: 440 Series et al.  
Nationwide Historic Experience by Calendar and Issue Year**

Calendar Year	Issue Year	Premium	Paid Claims	Reserves	IBNR	Total Incurred Claims	Loss Ratio	Calendar Year Duration
2011	1999	1,432,483	1,247,269	29,994	0	1,277,262	89.2%	13
2011	2000	1,521,116	1,357,909	74,637	0	1,432,546	94.2%	12
2011	2001	1,815,762	1,666,733	223,241	0	1,889,973	104.1%	11
2011	2002	1,106,536	245,988	0	0	245,988	22.2%	10
2011	2003	61,706	7,297	0	0	7,297	11.8%	9
2011	2004	0	0	0	0	0	0.0%	8
2012	1997	228,977	276,121	66,730	0	342,851	149.7%	16
2012	1998	2,130,291	1,764,623	300,247	0	2,064,870	96.9%	15
2012	1999	1,433,190	751,200	97,872	0	849,072	59.2%	14
2012	2000	1,542,828	930,154	211,220	0	1,141,374	74.0%	13
2012	2001	1,788,229	1,327,405	28,090	0	1,355,495	75.8%	12
2012	2002	1,067,929	1,335,830	231,178	0	1,567,008	146.7%	11
2012	2003	51,498	3,048	0	0	3,048	5.9%	10
2012	2004	0	0	0	0	0	0.0%	9
2013	1997	233,852	137,128	107,374	0	244,502	104.6%	17
2013	1998	2,012,893	1,810,333	1,077,996	0	2,888,330	143.5%	16
2013	1999	1,402,304	405,110	94,866	0	499,977	35.7%	15
2013	2000	1,515,944	1,445,796	415,257	0	1,861,053	122.8%	14
2013	2001	1,748,847	454,524	72,395	0	526,919	30.1%	13
2013	2002	1,009,097	125,058	29,899	0	154,957	15.4%	12
2013	2003	52,745	103,585	0	0	103,585	196.4%	11
2013	2004	0	0	0	0	0	0.0%	10
2014	1997	229,651	389,957	435,470	0	825,427	359.4%	18
2014	1998	1,972,082	1,188,150	1,118,744	0	2,306,894	117.0%	17
2014	1999	1,386,403	1,453,131	265,130	0	1,718,261	123.9%	16
2014	2000	1,419,022	613,238	125,543	0	738,780	52.1%	15
2014	2001	1,687,647	1,316,468	170,022	0	1,486,490	88.1%	14
2014	2002	951,039	649,060	365,277	0	1,014,337	106.7%	13
2014	2003	48,114	124,998	0	0	124,998	259.8%	12
2014	2004	0	0	0	0	0	0.0%	11
2015	1997	177,446	352,188	250,584	0	602,772	339.7%	19
2015	1998	1,763,766	1,817,241	2,062,680	0	3,879,921	220.0%	18
2015	1999	1,299,176	1,052,476	1,308,776	0	2,361,252	181.7%	17
2015	2000	1,165,461	611,224	712,953	0	1,324,177	113.6%	16
2015	2001	1,605,927	571,928	208,638	0	780,566	48.6%	15
2015	2002	956,769	486,358	87,892	0	574,250	60.0%	14
2015	2003	33,225	155,183	306,178	0	461,360	1388.6%	13
2015	2004	0	0	0	0	0	0.0%	12
2016	1997	222,639	43,187	0	0	43,187	19.4%	20
2016	1998	1,813,450	555,613	570,359	0	1,125,972	62.1%	19
2016	1999	1,336,588	512,820	400,037	0	912,857	68.3%	18
2016	2000	1,317,693	923,074	1,346,794	0	2,269,868	172.3%	17
2016	2001	1,616,986	1,036,241	2,045,972	0	3,082,213	190.6%	16
2016	2002	947,801	396,563	736,682	0	1,133,245	119.6%	15
2016	2003	40,530	0	0	0	0	0.0%	14
2016	2004	0	0	0	0	0	0.0%	13
2017	1997	210,190	74,159	10,619	9,842	94,620	45.0%	21
2017	1998	1,752,004	636,223	1,821,373	82,039	2,539,635	145.0%	20
2017	1999	1,291,164	704,422	3,311,225	59,299	4,074,946	315.6%	19
2017	2000	1,261,968	388,891	790,390	33,291	1,212,572	96.1%	18
2017	2001	1,551,014	520,773	952,824	19,691	1,493,288	96.3%	17
2017	2002	833,639	255,169	1,088,266	11,363	1,354,798	162.5%	16
2017	2003	41,731	0	0	598	598	1.4%	15
2017	2004	0	0	0	0	0	0.0%	14
2018	1997	143,864	2,356	62,290	22,665	87,311	60.7%	22
2018	1998	1,384,990	253,122	3,856,353	218,196	4,327,672	312.5%	21
2018	1999	1,002,417	88,655	1,118,483	154,714	1,361,852	135.9%	20
2018	2000	945,796	107,193	781,526	86,617	975,336	103.1%	19
2018	2001	1,205,744	122,361	898,901	51,039	1,072,301	88.9%	18
2018	2002	698,280	101,671	1,384,237	32,641	1,518,549	217.5%	17
2018	2003	26,970	0	0	1,434	1,434	5.3%	16
2018	2004	0	0	0	0	0	0.0%	15
1997	Total	42,468	0	0	0	0	0.0%	NA
1998	Total	1,433,082	218,801	0	0	218,801	15.3%	NA
1999	Total	3,213,700	269,230	0	0	269,230	8.4%	NA
2000	Total	4,622,248	907,491	0	0	907,491	19.6%	NA
2001	Total	6,883,391	1,662,303	0	0	1,662,303	24.1%	NA
2002	Total	8,627,119	2,012,238	0	0	2,012,238	23.3%	NA
2003	Total	8,879,166	4,526,316	57,985	0	4,584,301	51.6%	NA
2004	Total	9,147,885	4,441,021	210,777	0	4,651,798	50.9%	NA
2005	Total	9,679,023	3,213,392	0	0	3,213,392	33.2%	NA
2006	Total	9,609,495	4,719,762	261,198	0	4,980,960	51.8%	NA
2007	Total	9,317,368	4,045,076	105,044	0	4,150,120	44.5%	NA
2008	Total	8,713,090	4,619,014	0	0	4,619,014	53.0%	NA
2009	Total	8,400,758	7,067,085	442,782	0	7,509,866	89.4%	NA
2010	Total	7,764,047	4,414,788	194,172	0	4,608,960	59.4%	NA
2011	Total	8,331,465	6,792,207	327,871	0	7,120,078	85.5%	NA
2012	Total	8,242,942	6,388,381	935,337	0	7,323,718	88.8%	NA
2013	Total	7,975,682	4,481,536	1,797,787	0	6,279,323	78.7%	NA
2014	Total	7,693,958	5,735,002	2,480,185	0	8,215,187	106.8%	NA
2015	Total	7,001,770	5,046,596	4,937,702	0	9,984,299	142.6%	NA
2016	Total	7,295,688	3,467,499	5,099,843	0	8,567,342	117.4%	NA
2017	Total	6,941,711	2,579,635	7,974,697	216,124	10,770,457	155.2%	NA
2018	Total	5,408,060	675,357	8,101,791	567,306	9,344,454	172.8%	NA
Total	Total	155,224,116	77,282,731	32,927,172	783,430	110,993,334	71.5%	NA

Exhibit 3a

Continental General Insurance Company  
Policy Forms: 440 Series et al.  
Nationwide Experience  
All Policies Combined

Calendar Year	Without Proposed Rate Increase										With Proposed Rate Increase		
	Premium		By Incurral Year					Incurred Loss Ratio			Premium	Incurred	Incd LR
	Actual	PA Rtlvl	Pd Clms	Clm Res	IBNR	Inc Clms	Actual	PA Rtlvl		PA Rtlvl	Claims	PA Rtlvl	
1997	42,468	42,468	0	0	0	0	0.0%	0.0%		42,468	0	0.0%	
1998	1,433,082	1,433,082	218,801	0	0	218,801	15.3%	15.3%		1,433,082	218,801	15.3%	
1999	3,213,700	3,213,700	269,230	0	0	269,230	8.4%	8.4%		3,213,700	269,230	8.4%	
2000	4,622,248	4,615,379	907,491	0	0	907,491	19.6%	19.7%		4,615,379	907,491	19.7%	
2001	6,883,391	6,521,464	1,662,303	0	0	1,662,303	24.1%	25.5%		6,521,464	1,662,303	25.5%	
2002	8,627,119	8,089,537	2,012,238	0	0	2,012,238	23.3%	24.9%		8,089,537	2,012,238	24.9%	
2003	8,879,166	9,303,864	4,526,316	57,985	0	4,584,301	51.6%	49.3%		9,303,864	4,584,301	49.3%	
2004	9,147,885	9,632,537	4,441,021	210,777	0	4,651,798	50.9%	48.3%		9,632,537	4,651,798	48.3%	
2005	9,679,023	10,856,509	3,213,392	0	0	3,213,392	33.2%	29.6%		10,856,509	3,213,392	29.6%	
2006	9,609,495	10,395,645	4,719,762	261,198	0	4,980,960	51.8%	47.9%		10,395,645	4,980,960	47.9%	
2007	9,317,368	10,011,306	4,045,076	105,044	0	4,150,120	44.5%	41.5%		10,011,306	4,150,120	41.5%	
2008	8,713,090	9,338,163	4,619,014	0	0	4,619,014	53.0%	49.5%		9,338,163	4,619,014	49.5%	
2009	8,400,758	9,023,922	7,067,085	442,782	0	7,509,866	89.4%	83.2%		9,023,922	7,509,866	83.2%	
2010	7,764,047	8,108,446	4,414,788	194,172	0	4,608,960	59.4%	56.8%		8,108,446	4,608,960	56.8%	
2011	8,331,465	8,117,885	6,792,207	327,871	0	7,120,078	85.5%	87.7%		8,117,885	7,120,078	87.7%	
2012	8,242,942	8,137,167	6,388,381	935,337	0	7,323,718	88.8%	90.0%		8,137,167	7,323,718	90.0%	
2013	7,975,682	8,071,546	4,481,536	1,797,787	0	6,279,323	78.7%	77.8%		8,071,546	6,279,323	77.8%	
2014	7,693,958	7,612,956	5,735,002	2,480,185	0	8,215,187	106.8%	107.9%		7,612,956	8,215,187	107.9%	
2015	7,001,770	7,100,266	5,046,596	4,937,702	0	9,984,299	142.6%	140.6%		7,100,266	9,984,299	140.6%	
2016	7,295,688	7,753,359	3,467,499	5,099,843	0	8,567,342	117.4%	110.5%		7,753,359	8,567,342	110.5%	
2017	6,941,711	7,399,674	2,579,635	7,974,697	216,124	10,770,457	155.2%	145.6%		7,399,674	10,770,457	145.6%	
Jan-Oct 2018	5,408,060	5,548,188	675,357	8,101,791	567,306	9,344,454	172.8%	168.4%		5,548,188	9,344,454	168.4%	
Nov-Dec 2018		1,109,638				1,868,891		168.4%		1,109,638	1,868,891	168.4%	
2019		6,772,304				9,687,248		143.0%		6,772,304	9,687,248	143.0%	
2020		6,371,666				10,284,068		161.4%		6,371,666	10,284,068	161.4%	
2021		5,864,518				10,818,785		184.5%		5,864,518	10,818,785	184.5%	
2022		5,358,751				11,297,189		210.8%		5,358,751	11,297,189	210.8%	
2023		4,862,457				11,695,786		240.5%		4,862,457	11,695,786	240.5%	
2024		4,398,269				12,021,618		273.3%		4,398,269	12,021,618	273.3%	
2025		3,958,730				12,262,866		309.8%		3,958,730	12,262,866	309.8%	
2026		3,542,274				12,413,763		350.4%		3,542,274	12,413,763	350.4%	
2027		3,150,675				12,459,340		395.4%		3,150,675	12,459,340	395.4%	
2028		2,785,052				12,382,626		444.6%		2,785,052	12,382,626	444.6%	
2029		2,446,078				12,195,003		498.6%		2,446,078	12,195,003	498.6%	
2030		2,134,199				11,896,301		557.4%		2,134,199	11,896,301	557.4%	
2031		1,847,394				11,492,026		622.1%		1,847,394	11,492,026	622.1%	
2032		1,584,674				10,974,137		692.5%		1,584,674	10,974,137	692.5%	
2033		1,347,082				10,363,231		769.3%		1,347,082	10,363,231	769.3%	
2034		1,141,504				9,690,824		849.0%		1,141,504	9,690,824	849.0%	
2035		961,591				8,966,696		932.5%		961,591	8,966,696	932.5%	
2036		804,268				8,211,808		1021.0%		804,268	8,211,808	1021.0%	
2037		667,858				7,432,968		1113.0%		667,858	7,432,968	1113.0%	
2038		550,610				6,645,274		1206.9%		550,610	6,645,274	1206.9%	
2039		450,710				5,886,310		1306.0%		450,710	5,886,310	1306.0%	
2040		366,374				5,160,914		1408.6%		366,374	5,160,914	1408.6%	
2041		294,987				4,473,952		1516.7%		294,987	4,473,952	1516.7%	
2042		235,321				3,836,767		1630.4%		235,321	3,836,767	1630.4%	
2043		186,079				3,254,984		1749.2%		186,079	3,254,984	1749.2%	
2044		146,762				2,746,247		1871.2%		146,762	2,746,247	1871.2%	
2045		115,144				2,299,657		1997.2%		115,144	2,299,657	1997.2%	
2046		89,698				1,919,189		2139.6%		89,698	1,919,189	2139.6%	
2047		69,381				1,590,109		2291.9%		69,381	1,590,109	2291.9%	
2048		53,279				1,302,033		2443.8%		53,279	1,302,033	2443.8%	
2049		40,612				1,056,099		2600.5%		40,612	1,056,099	2600.5%	
2050		30,721				847,241		2757.8%		30,721	847,241	2757.8%	
2051		22,933				673,341		2936.1%		22,933	673,341	2936.1%	
2052		16,977				529,950		3121.6%		16,977	529,950	3121.6%	
2053		12,462				413,847		3320.8%		12,462	413,847	3320.8%	
2054		9,100				320,791		3525.1%		9,100	320,791	3525.1%	
2055		6,597				243,589		3692.2%		6,597	243,589	3692.2%	
2056		4,739				183,073		3863.2%		4,739	183,073	3863.2%	
2057		3,370				136,429		4048.7%		3,370	136,429	4048.7%	
2058		2,368				100,016		4223.1%		2,368	100,016	4223.1%	
2059		1,645				72,207		4390.2%		1,645	72,207	4390.2%	
2060		1,129				51,209		4534.0%		1,129	51,209	4534.0%	
2061		763				35,661		4673.5%		763	35,661	4673.5%	
2062		510				24,503		4805.4%		510	24,503	4805.4%	
2063		336				16,681		4963.3%		336	16,681	4963.3%	
2064		218				11,264		5155.6%		218	11,264	5155.6%	
2065		140				7,589		5411.8%		140	7,589	5411.8%	
2066		89				5,159		5793.1%		89	5,159	5793.1%	
2067		56				3,483		6213.3%		56	3,483	6213.3%	
2068		35				2,323		6680.5%		35	2,323	6680.5%	
2069		21				1,527		7214.5%		21	1,527	7214.5%	
2070		13				995		7784.5%		13	995	7784.5%	
2071		8				647		8424.2%		8	647	8424.2%	
2072		5				422		9137.9%		5	422	9137.9%	
2073		3				276		9906.6%		3	276	9906.6%	
2074		2				173		10318.2%		2	173	10318.2%	
2075		1				108		10951.2%		1	108	10951.2%	
2076		1				67		11528.9%		1	67	11528.9%	
2077		0				39		11681.8%		0	39	11681.8%	
Past Lifetime	without interest	160,327,064				110,993,334		69.2%		160,327,064	110,993,334	69.2%	
Future Lifetime		63,822,182				252,269,320		395.3%		121,116,733	253,331,723	209.2%	
Past Lifetime	with interest	224,149,245				363,262,654		162.1%		281,443,797	364,325,056	129.4%	
Future Lifetime		267,934,491				160,592,927		59.9%		267,934,491	160,592,927	59.9%	
Past Lifetime		47,054,316				150,889,036		320.7%		85,987,999	152,911,367	177.8%	
Future Lifetime		314,988,808				311,481,964		98.9%		353,922,490	313,504,294	88.6%	

The interest rate used to accumulate historical values and discount future values is 5.0%.

Exhibit 3b

Continental General Insurance Company  
 Policy Forms: 440 Series et al.  
 Nationwide Experience  
 Policies in Paid Up Status

Calendar Year	Without Proposed Rate Increase								With Proposed Rate Increase		
	Premium		By Incurral Year				Incurred Loss Ratio		Premium	Incurred	Incld LR
	Actual	PA Rtlvl	Pd Clms	Clim Res	IBNR	Inc Clms	Actual	PA Rtlvl	PA Rtlvl	Claims	PA Rtlvl
1997	1,773	1,773	0	0	0	0	0.0%	0.0%	1,773	0	0.0%
1998	82,133	82,133	0	0	0	0	0.0%	0.0%	82,133	0	0.0%
1999	203,592	203,592	0	0	0	0	0.0%	0.0%	203,592	0	0.0%
2000	326,043	325,571	0	0	0	0	0.0%	0.0%	325,571	0	0.0%
2001	550,605	523,149	9,170	0	0	9,170	1.7%	1.8%	523,149	9,170	1.8%
2002	706,763	665,517	1,051	0	0	1,051	0.1%	0.2%	665,517	1,051	0.2%
2003	893,443	941,831	849	0	0	849	0.1%	0.1%	941,831	849	0.1%
2004	1,033,591	1,096,563	1,860	0	0	1,860	0.2%	0.2%	1,096,563	1,860	0.2%
2005	1,242,112	1,412,665	24,749	0	0	24,749	2.0%	1.8%	1,412,665	24,749	1.8%
2006	1,327,196	1,463,807	3,330	0	0	3,330	0.3%	0.2%	1,463,807	3,330	0.2%
2007	1,362,644	1,494,698	7,504	0	0	7,504	0.6%	0.5%	1,494,698	7,504	0.5%
2008	1,419,775	1,552,348	124,290	0	0	124,290	8.8%	8.0%	1,552,348	124,290	8.0%
2009	1,377,545	1,512,887	22,810	0	0	22,810	1.7%	1.5%	1,512,887	22,810	1.5%
2010	1,253,929	1,333,901	122,523	0	0	122,523	9.8%	9.2%	1,333,901	122,523	9.2%
2011	928,463	919,265	40,462	0	0	40,462	4.4%	4.4%	919,265	40,462	4.4%
2012	688,395	683,316	147,000	0	0	147,000	21.4%	21.5%	683,316	147,000	21.5%
2013	539,565	543,796	49,889	0	0	49,889	9.2%	9.2%	543,796	49,889	9.2%
2014	424,407	414,977	118,823	0	0	118,823	28.0%	28.6%	414,977	118,823	28.6%
2015	257,056	256,278	226,212	0	0	226,212	88.0%	88.3%	256,278	226,212	88.3%
2016	188,437	197,371	103,883	0	0	103,883	55.1%	52.6%	197,371	103,883	52.6%
2017	160,973	167,795	107,041	25,955	4,583	137,579	85.5%	82.0%	167,795	137,579	82.0%
2018	80,594	82,498	58,097	652,908	7,313	718,318	891.3%	870.7%	82,498	718,318	870.7%
Jan-Oct						143,664			0	143,664	
Nov-Dec						336,407			0	336,407	
2019						327,983			0	327,983	
2020						318,187			0	318,187	
2021						306,413			0	306,413	
2022						293,164			0	293,164	
2023						277,755			0	277,755	
2024						260,226			0	260,226	
2025						242,060			0	242,060	
2026						222,919			0	222,919	
2027						203,770			0	203,770	
2028						183,732			0	183,732	
2029						163,843			0	163,843	
2030						145,014			0	145,014	
2031						126,404			0	126,404	
2032						109,130			0	109,130	
2033						93,041			0	93,041	
2034						78,660			0	78,660	
2035						65,887			0	65,887	
2036						54,758			0	54,758	
2037						45,244			0	45,244	
2038						36,951			0	36,951	
2039						30,103			0	30,103	
2040						24,477			0	24,477	
2041						19,771			0	19,771	
2042						16,030			0	16,030	
2043						13,037			0	13,037	
2044						10,636			0	10,636	
2045						8,759			0	8,759	
2046						7,318			0	7,318	
2047						6,152			0	6,152	
2048						5,184			0	5,184	
2049						4,368			0	4,368	
2050						3,699			0	3,699	
2051						3,144			0	3,144	
2052						2,647			0	2,647	
2053						2,240			0	2,240	
2054						1,898			0	1,898	
2055						1,596			0	1,596	
2056						1,350			0	1,350	
2057						1,147			0	1,147	
2058						969			0	969	
2059						818			0	818	
2060						681			0	681	
2061						572			0	572	
2062						484			0	484	
2063						395			0	395	
2064						314			0	314	
2065						246			0	246	
2066						189			0	189	
2067						143			0	143	
2068						104			0	104	
2069						74			0	74	
2070						52			0	52	
2071						36			0	36	
2072						24			0	24	
2073						16			0	16	
2074						10			0	10	
2075						6			0	6	
2076						4			0	4	
2077											
Past		15,875,730				1,860,302		11.7%	15,875,730	1,860,302	11.7%
Future	without					4,203,905			0	4,203,905	
Lifetime	interest	15,875,730				6,064,207		38.2%	15,875,730	6,064,207	38.2%
Past		27,623,740				2,253,592		8.2%	27,623,740	2,253,592	8.2%
Future	with					2,983,319			0	2,983,319	
Lifetime	interest	27,623,740				5,236,911		19.0%	27,623,740	5,236,911	19.0%

The interest rate used to accumulate historical values and discount future values is 5.0%.

Exhibit 3c

Continental General Insurance Company  
 Policy Forms: 440 Series et al.  
 Nationwide Experience  
 Policies in Premium Paying Status

Calendar Year	Without Proposed Rate Increase									With Proposed Rate Increase		
	Premium		By Incurral Year					Incurred Loss Ratio		Premium	Incurred	Incld LR
	Actual	PA RtlLvl	Pd Clms	Clim Res	IBNR	Inc Clms	Actual	PA RtlLvl	PA RtlLvl	Claims	PA RtlLvl	
1997	40,695	40,695	0	0	0	0	0.0%	0.0%	40,695	0	0.0%	
1998	1,350,949	1,350,949	218,801	0	0	218,801	16.2%	16.2%	1,350,949	218,801	16.2%	
1999	3,010,108	3,010,108	269,230	0	0	269,230	8.9%	8.9%	3,010,108	269,230	8.9%	
2000	4,296,205	4,289,808	907,491	0	0	907,491	21.1%	21.2%	4,289,808	907,491	21.2%	
2001	6,332,785	5,998,315	1,653,134	0	0	1,653,134	26.1%	27.6%	5,998,315	1,653,134	27.6%	
2002	7,920,355	7,424,020	2,011,187	0	0	2,011,187	25.4%	27.1%	7,424,020	2,011,187	27.1%	
2003	7,985,723	8,362,034	4,525,467	57,985	0	4,583,452	57.4%	54.8%	8,362,034	4,583,452	54.8%	
2004	8,114,294	8,535,974	4,439,161	210,777	0	4,649,938	57.3%	54.5%	8,535,974	4,649,938	54.5%	
2005	8,436,911	9,443,843	3,188,643	0	0	3,188,643	37.8%	33.8%	9,443,843	3,188,643	33.8%	
2006	8,282,299	8,931,838	4,716,432	261,198	0	4,977,631	60.1%	55.7%	8,931,838	4,977,631	55.7%	
2007	7,954,723	8,516,608	4,037,572	105,044	0	4,142,616	52.1%	48.6%	8,516,608	4,142,616	48.6%	
2008	7,293,315	7,785,815	4,494,723	0	0	4,494,723	61.6%	57.7%	7,785,815	4,494,723	57.7%	
2009	7,023,213	7,511,035	7,044,275	442,782	0	7,487,057	106.6%	99.7%	7,511,035	7,487,057	99.7%	
2010	6,510,117	6,774,546	4,292,266	194,172	0	4,486,437	68.9%	66.2%	6,774,546	4,486,437	66.2%	
2011	7,403,002	7,198,620	6,751,745	327,871	0	7,079,617	95.6%	98.3%	7,198,620	7,079,617	98.3%	
2012	7,554,548	7,453,851	6,241,381	935,337	0	7,176,717	95.0%	96.3%	7,453,851	7,176,717	96.3%	
2013	7,436,117	7,527,751	4,431,646	1,797,787	0	6,229,434	83.8%	82.8%	7,527,751	6,229,434	82.8%	
2014	7,269,551	7,197,979	5,616,179	2,480,185	0	8,096,364	111.4%	112.5%	7,197,979	8,096,364	112.5%	
2015	6,744,714	6,843,988	4,820,384	4,937,702	0	9,758,087	144.7%	142.6%	6,843,988	9,758,087	142.6%	
2016	7,107,251	7,555,989	3,363,616	5,099,843	0	8,463,459	119.1%	112.0%	7,555,989	8,463,459	112.0%	
2017	6,780,738	7,231,879	2,472,594	7,948,742	211,541	10,632,878	156.8%	147.0%	7,231,879	10,632,878	147.0%	
2018	5,327,466	5,465,691	617,260	7,448,882	559,994	8,626,136	161.9%	157.8%	5,465,691	8,626,136	157.8%	
Jan-Oct		1,109,638		1,725,227		1,725,227		155.5%	1,109,638	1,725,227	155.5%	
Nov-Dec		6,772,304		9,350,841		9,350,841		138.1%	6,772,304	9,350,841	138.1%	
2019		6,371,666		9,956,084		9,956,084		156.3%	9,349,481	10,300,116	110.2%	
2020		5,864,518		10,500,598		10,500,598		179.1%	11,786,211	11,154,568	94.6%	
2021		5,358,751		10,990,776		10,990,776		205.1%	10,850,885	11,596,088	106.9%	
2022		4,862,457		11,402,622		11,402,622		234.5%	9,918,909	11,947,291	120.4%	
2023		4,398,269		11,743,863		11,743,863		267.0%	9,041,688	12,219,770	135.1%	
2024		3,958,730		12,002,640		12,002,640		303.2%	8,200,845	12,403,455	151.2%	
2025		3,542,274		12,171,703		12,171,703		343.6%	7,393,340	12,492,021	169.0%	
2026		3,150,675		12,236,422		12,236,422		388.4%	6,624,086	12,474,997	188.3%	
2027		2,785,052		12,178,857		12,178,857		437.3%	5,896,922	12,337,966	209.2%	
2028		2,446,078		12,011,271		12,011,271		491.0%	5,214,765	12,095,668	232.0%	
2029		2,134,199		11,732,457		11,732,457		549.7%	4,579,870	11,748,922	256.5%	
2030		1,847,394		11,347,012		11,347,012		614.2%	3,989,062	11,302,435	283.3%	
2031		1,584,674		10,847,734		10,847,734		684.5%	3,441,373	10,750,775	312.4%	
2032		1,347,082		10,254,101		10,254,101		761.2%	2,940,934	10,114,645	343.9%	
2033		1,141,504		9,597,783		9,597,783		840.8%	2,505,407	9,427,980	376.3%	
2034		961,591		8,888,036		8,888,036		924.3%	2,121,050	8,698,990	410.1%	
2035		804,268		8,145,921		8,145,921		1012.8%	1,782,185	7,944,725	445.8%	
2036		667,858		7,378,210		7,378,210		1104.8%	1,486,124	7,173,289	482.7%	
2037		550,610		6,600,030		6,600,030		1198.7%	1,229,881	6,398,520	520.3%	
2038		450,710		5,849,358		5,849,358		1297.8%	1,010,182	5,655,806	559.9%	
2039		366,374		5,130,811		5,130,811		1400.4%	823,662	4,949,144	600.9%	
2040		294,987		4,449,476		4,449,476		1508.4%	664,906	4,282,216	644.0%	
2041		235,321		3,816,996		3,816,996		1622.0%	531,603	3,665,540	689.5%	
2042		186,079		3,238,954		3,238,954		1740.6%	421,188	3,104,285	737.0%	
2043		146,762		2,733,210		2,733,210		1862.3%	332,787	2,614,825	785.7%	
2044		115,144		2,289,021		2,289,021		1988.0%	261,493	2,186,326	836.1%	
2045		89,698		1,910,430		1,910,430		2129.8%	203,967	1,821,705	893.1%	
2046		69,381		1,582,791		1,582,791		2281.3%	157,932	1,506,884	954.1%	
2047		53,279		1,295,882		1,295,882		2432.3%	121,382	1,231,966	1015.0%	
2048		40,612		1,050,914		1,050,914		2587.7%	92,583	997,743	1077.7%	
2049		30,721		842,872		842,872		2743.6%	70,064	799,217	1140.7%	
2050		22,933		669,642		669,642		2920.0%	52,289	634,074	1212.6%	
2051		16,977		526,806		526,806		3103.1%	38,690	498,135	1287.5%	
2052		12,462		411,200		411,200		3299.6%	28,391	388,328	1367.8%	
2053		9,100		318,550		318,550		3500.5%	20,713	300,482	1450.7%	
2054		6,597		241,691		241,691		3663.4%	14,998	227,770	1518.7%	
2055		4,739		181,477		181,477		3829.5%	10,757	170,874	1588.5%	
2056		3,370		135,079		135,079		4008.7%	7,636	127,079	1664.2%	
2057		2,368		98,870		98,870		4174.7%	5,356	92,942	1735.2%	
2058		1,645		71,239		71,239		4331.3%	3,712	66,918	1802.8%	
2059		1,129		50,391		50,391		4461.6%	2,543	47,297	1859.6%	
2060		763		34,980		34,980		4584.3%	1,714	32,803	1914.0%	
2061		510		23,931		23,931		4693.2%	1,143	22,420	1961.4%	
2062		336		16,197		16,197		4819.4%	753	15,159	2014.3%	
2063		218		10,869		10,869		4974.9%	489	10,162	2077.1%	
2064		140		7,275		7,275		5187.8%	315	6,796	2160.8%	
2065		89		4,913		4,913		5517.0%	200	4,585	2288.5%	
2066		56		3,294		3,294		5875.5%	127	3,069	2421.9%	
2067		35		2,180		2,180		6269.7%	79	2,029	2565.0%	
2068		21		1,422		1,422		6720.9%	49	1,323	2726.7%	
2069		13		920		920		7202.0%	30	855	2895.9%	
2070		8		595		595		7746.8%	18	553	3089.0%	
2071		5		387		387		8365.5%	11	359	3309.7%	
2072		3		252		252		9048.1%	7	234	3553.6%	
2073		2		157		157		9386.0%	4	146	3661.8%	
2074		1		98		98		9927.6%	2	91	3851.3%	
2075		1		60		60		10422.5%	1	56	4013.5%	
2076		0		35		35		10492.0%	1	33	4026.2%	
2077		0		35		35		10492.0%	1	33	4026.2%	
Past						109,133,032		75.6%	144,451,334	109,133,032	75.6%	
Future	without interest	144,451,334				248,065,415		388.7%	121,116,733	249,127,818	205.7%	
Lifetime		208,273,516				357,198,447		171.5%	265,568,067	358,260,850	134.9%	
Past						158,339,335		65.9%	240,310,751	158,339,335	65.9%	
Future	with interest	47,054,316				147,905,717		314.3%	85,987,999	149,928,048	174.4%	
Lifetime		287,365,067				306,245,052		106.6%	326,298,750	308,267,383	94.5%	

The interest rate used to accumulate historical values and discount future values is 5.0%.

Exhibit 4

Continental General Insurance Company  
 Policy Forms: 440 Series et al.  
 Pennsylvania Experience  
 All Policies Combined

Calendar Year	Without Proposed Rate Increase								With Proposed Rate Increase		
	Earned		By Incurral Year					Incurred LR	Earned	Incurred	Incurred
	Actual	Premium	Pd Clms	Clim Res	IBNR	Inc Clms	Actual	Premium	Claims	Loss Ratio	
1997	0	0	0	0	0	0	0	0	0	0	
1998	446	446	0	0	0	0	0.0%	446	0	0.0%	
1999	50,752	50,752	0	0	0	0	0.0%	50,752	0	0.0%	
2000	103,141	103,141	0	0	0	0	0.0%	103,141	0	0.0%	
2001	118,141	118,141	0	0	0	0	0.0%	118,141	0	0.0%	
2002	142,146	142,146	0	0	0	0	0.0%	142,146	0	0.0%	
2003	168,802	168,802	1,564	0	0	1,564	0.9%	168,802	1,564	0.9%	
2004	187,144	187,144	0	0	0	0	0.0%	187,144	0	0.0%	
2005	193,992	193,992	46,155	0	0	46,155	23.8%	193,992	46,155	23.8%	
2006	189,820	189,820	0	0	0	0	0.0%	189,820	0	0.0%	
2007	185,111	185,111	49,890	0	0	49,890	27.0%	185,111	49,890	27.0%	
2008	170,824	170,824	4,711	0	0	4,711	2.8%	170,824	4,711	2.8%	
2009	162,313	162,313	0	0	0	0	0.0%	162,313	0	0.0%	
2010	148,914	148,914	0	0	0	0	0.0%	148,914	0	0.0%	
2011	153,609	153,609	0	0	0	0	0.0%	153,609	0	0.0%	
2012	165,252	165,252	0	0	0	0	0.0%	165,252	0	0.0%	
2013	171,707	171,707	90,064	0	0	90,064	52.5%	171,707	90,064	52.5%	
2014	167,759	167,759	480,138	0	0	480,138	286.2%	167,759	480,138	286.2%	
2015	196,232	196,232	0	0	0	0	0.0%	196,232	0	0.0%	
2016	191,348	191,348	18,146	0	0	18,146	9.5%	191,348	18,146	9.5%	
2017	184,285	184,285	6,643	0	8,629	15,272	8.3%	184,285	15,272	8.3%	
2018	136,138	136,138	0	46,062	21,448	67,510	49.6%	136,138	67,510	49.6%	
Jan-Oct 2018		27,228				17,862	65.6%	27,228	17,862	65.6%	
Nov-Dec 2018		163,016				163,183	100.1%	163,016	163,183	100.1%	
2019		154,371				176,507	114.3%	250,738	188,049	75.0%	
2020		143,612				189,742	132.1%	322,914	212,326	65.8%	
2021		133,319				205,740	154.3%	299,769	227,315	75.8%	
2022		123,524				223,449	180.9%	277,745	243,690	87.7%	
2023		114,250				242,643	212.4%	256,893	261,231	101.7%	
2024		105,499				262,466	248.8%	237,216	279,174	117.7%	
2025		97,228				283,198	291.3%	218,618	297,795	136.2%	
2026		89,363				307,447	344.0%	200,934	319,598	159.1%	
2027		81,865				328,632	401.4%	184,074	338,400	183.8%	
2028		74,712				347,924	465.7%	167,990	355,254	211.5%	
2029		67,868				366,160	539.5%	152,602	371,072	243.2%	
2030		61,329				380,498	620.4%	137,899	383,125	277.8%	
2031		55,095				391,032	709.7%	123,882	391,426	316.0%	
2032		49,161				395,179	803.9%	110,539	393,587	356.1%	
2033		43,544				393,724	904.2%	97,909	390,377	398.7%	
2034		38,269				387,934	1013.7%	86,049	382,989	445.1%	
2035		33,351				376,396	1128.6%	74,990	370,215	493.7%	
2036		28,804				361,047	1253.4%	64,767	353,844	546.3%	
2037		24,652				338,104	1371.5%	55,430	330,410	596.1%	
2038		20,911				313,268	1498.1%	47,020	305,267	649.2%	
2039		17,590				286,802	1630.5%	39,551	278,727	704.7%	
2040		14,680				260,222	1772.6%	33,008	252,238	764.2%	
2041		12,166				235,234	1933.5%	27,356	227,416	831.3%	
2042		10,031				208,798	2081.5%	22,555	201,443	893.1%	
2043		8,246				185,203	2246.0%	18,541	178,299	961.6%	
2044		6,767				164,313	2428.3%	15,215	157,865	1037.6%	
2045		5,542				146,252	2638.9%	12,461	140,229	1125.3%	
2046		4,532				132,246	2917.8%	10,191	126,498	1241.2%	
2047		3,707				117,594	3172.1%	8,336	112,271	1346.9%	
2048		3,033				105,116	3466.1%	6,819	100,161	1488.8%	
2049		2,479				92,547	3733.8%	5,573	88,047	1579.8%	
2050		2,021				81,525	4034.0%	4,544	77,442	1704.2%	
2051		1,643				71,777	4369.7%	3,693	68,080	1843.3%	
2052		1,331				63,472	4770.0%	2,992	60,110	2009.0%	
2053		1,072				55,861	5211.8%	2,410	52,821	2191.8%	
2054		857				46,712	5452.6%	1,926	44,132	2291.0%	
2055		678				38,574	5691.1%	1,524	36,411	2389.1%	
2056		529				31,653	5984.3%	1,189	29,846	2509.5%	
2057		405				25,208	6219.8%	911	23,748	2606.0%	
2058		304				19,601	6441.5%	684	18,450	2696.5%	
2059		224				14,800	6600.8%	504	13,918	2760.7%	
2060		162				10,907	6729.3%	364	10,248	2811.8%	
2061		115				7,830	6813.7%	258	7,351	2844.7%	
2062		80				5,437	6817.0%	179	5,100	2843.8%	
2063		54				3,654	6745.1%	122	3,424	2811.6%	
2064		36				2,465	6797.3%	82	2,309	2831.4%	
2065		24				1,727	7195.2%	54	1,616	2994.6%	
2066		16				1,197	7579.9%	35	1,118	3149.3%	
2067		10				817	7991.7%	23	762	3315.8%	
2068		6				545	8440.2%	15	508	3498.2%	
2069		4				356	8846.5%	9	332	3664.0%	
2070		2				234	9407.0%	6	218	3893.6%	
2071		2				155	10001.1%	3	144	4137.5%	
2072		1				102	10595.7%	2	95	4381.7%	
2073		1				65	10931.2%	1	61	4519.5%	
2074		0				42	11483.8%	1	39	4746.6%	
2075		0				28	12267.9%	1	26	5068.9%	
2076		0				18	12878.1%	0	17	5319.8%	
2077		0				0		0	0		
Past		3,187,876				773,449	24.3%	3,187,876	773,449	24.3%	
Future	without interest	1,829,320				8,871,227	484.9%	3,779,363	8,897,709	235.4%	
Lifetime		5,017,196				9,644,676	192.2%	6,967,239	9,671,158	138.8%	
Past		5,165,848				1,007,831	19.4%	5,165,848	1,007,831	19.4%	
Future	with interest	1,279,054				4,391,109	343.3%	2,556,260	4,474,222	175.0%	
Lifetime		6,444,902				5,392,940	83.7%	7,722,108	5,476,053	70.9%	

The interest rate used to accumulate historical values and discount future values is 5.0%.