

As the Court recognized in its Form of Notice, the Rehabilitator has the discretion to offer and distribute amendments to the Proposed Plan. Thus, the Amended Plan is offered for the Court's consideration and approval as requested by the Rehabilitator in the Plan Approval Application.

In addition, the Rehabilitator notes for the Court's information that, apart from many technical changes and refinements, the Amended Plan addresses most or all of the material and substantial concerns raised in response to the initial Proposed Plan filed on April 22, 2020. A list of the material changes appears in Appendix A of the Amended Plan. Among other matters, the Amended Plan includes:

1. projections of the Amended Plan's likely effectiveness under different scenarios, beginning at page 17;
2. a detailed description of the methodology employed in the Plan's design, at pages 18 through 36;
3. a detailed description of a change in the treatment of reinsurance assumed which is responsive to a concern expressed by certain regulators in other states, beginning at page 91;
4. a description of alternatives considered in arriving at the Plan, beginning at page 98;

5. a new mechanism to address concerns expressed by certain regulators about premium rates being set under the Plan and not by them, beginning at page 102;
6. new material addressed to concerns about premiums suspended for policyholders on waiver, beginning at page 102; and
7. robust financial information about SHIP, appearing in Appendix B.

The Rehabilitator is also making available to parties admitted to the case by the Court, and to all state insurance departments, a confidential comprehensive seriatim actuarial file (the “Actuarial File”). The Actuarial File contains 170 parameters of information for every SHIP LTC policy in force as applicable, as well as a data dictionary to facilitate its use. Together with the Amended Plan, this Actuarial File should enable every party and insurance department to understand fully the Plan’s operation, and also enable every party and insurance department to generate customized reports about virtually any aspect of SHIP’s LTC business and the Plan in which they might reasonably be interested.

The Amended Plan will be posted to SHIP’s court documents website at <https://www.shipltc.com/court-documents>. Access to the Actuarial File will require credentialing and confidentiality agreements, and, above and beyond such protections, personal identifying information will be removed from or anonymized in the Actuarial File to further protect the privacy interests of SHIP’s policyholders.

Dated: October 21, 2020

Respectfully submitted,

/s/ Michael J. Broadbent

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CERTIFICATE OF SERVICE

I, Michael J. Broadbent, hereby certify that on October 21, 2020, I served the foregoing Notice of Filing of Amended Rehabilitation Plan and the Amended Rehabilitation Plan for SHIP filed concurrently therewith on all parties listed on the Master Service List by electronic mail, and I further certify that an electronic copy of the foregoing documents will be posted on SHIP's website at <https://www.shipltc.com/court-documents>.

/s/ Michael J. Broadbent

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