

STATE OF CONNECTICUT
INSURANCE DEPARTMENT

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In The Matter Of: :
Central States Health & Life : **Docket No. LH 15-90**
Insurance Company of Omaha :
Medicare Supplement Insurance :
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ORDER

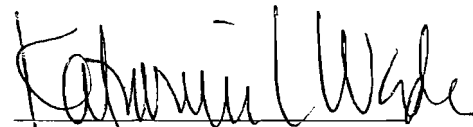
I, Katharine L Wade, Commissioner of the State of Connecticut, having read the record, do hereby adopt the findings and recommendations of Danny K. Albert, Hearing Officer in the above matter and issue the following order, to wit:

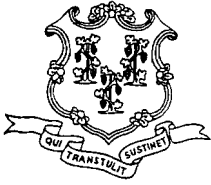
The Medicare supplement insurance rate increase request submitted by Central States Health & Life Insurance Company of Omaha, for its individual Standardized Medicare supplement insurance policy form series S-25, S-26, S-27, S-28, S-29, S-30 and S-31 (Plans A, B, C, D, E, F and G) is approved as submitted.

Additionally, the company's proposal to maintain its existing rates on its group Standardized Medicare supplement insurance policy form series S48A, S49B, S50C, S51D and S53F, with no change, is approved as proposed.

The rate change approved herein is reasonable in light of the benefits, estimated claim costs and anticipated loss ratios the company expects to realized on this block of business.

Dated at Hartford, Connecticut, this 3rd day of August, 2015.


Katharine L Wade
Commissioner



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PROPOSED FINAL DECISION

1. INTRODUCTION

The Insurance Commissioner of the State of Connecticut is empowered to review rates charged for individual and group Medicare supplement policies sold to any resident of this State who is eligible for Medicare. The source for this regulatory authority is contained in Chapter 700c and Section 38a-495a of the Connecticut General Statutes.

After due notice a hearing was held at the Insurance Department in Hartford on July 23, 2015 to consider whether or not the rate increase requested by Central States Health & Life Insurance Company of Omaha on its individual standardized Medicare supplement business should be approved.

No members from the general public attended the hearing.

No Company representatives from Central States attended the hearing.

The hearing was conducted in accordance with the requirements of Section 38a-474, Connecticut General Statutes, the Uniform Administrative Procedures Act, Chapter 54 of the Connecticut General Statutes, and the Insurance Department Rules of Practice, Section 38a-8-1 et seq. of the Regulations of Connecticut State Agencies.

A Medicare supplement (or Medigap) policy is a private health insurance policy sold on an individual or group basis, which provides benefits that are additional to the benefits, provided by Medicare. For many years Medicare supplement policies have been highly regulated under both state and federal law to protect the interests of persons eligible for Medicare who depend on these policies to provide additional coverage for the costs of health care.

Effective December 1, 2005, Connecticut amended its program of standardized Medicare supplement policies in accordance with Section 38a-496a of the Connecticut General Statutes, and Sections 38a-495a-1 through 38a-495a-21 of the Regulations of Connecticut Agencies. This program, which conforms to federal requirements, provides that all

“core” package of benefits known as Plan A. Insurers may also offer any one or more of eleven other plans (Plans B through N).

Effective January 1, 2006, in accordance with Section 38a-495c of the Connecticut General Statutes (as amended by Public Act 05-20) premiums for all Medicare supplement policies in the state must use community rating. Rates for Plans A through N must be computed without regard to age, gender, previous claims history or the medical condition of any person covered by a Medicare supplement policy or certificate.

The statute provides that coverage under Plan A through N may not be denied on the basis of age, gender, previous claims history or the medical condition of any covered person. Insurers may exclude benefits for losses incurred within six months from the effective date of coverage based on a pre-existing condition.

Effective October 1, 1998, carriers that offer Plan B or Plan C must make these plans as well as Plan A, available to all persons eligible for Medicare by reason of disability.

Insurers must also make the necessary arrangements to receive notice of all claims paid by Medicare for their insureds so that supplemental benefits can be computed and paid without requiring insureds to file claim forms for such benefits. This process of direct notice and automatic claims payment is commonly referred to as “piggybacking” or “crossover”.

Sections 38a-495 and 38a-522 of the Connecticut General Statutes, and Section 38a-495a-10 of the Regulations of Connecticut Agencies, state that individual and group Medicare supplement policies must have anticipated loss ratios of 65% and 75%, respectively. Under Sections 38a-495-7 and 38a-495a-10 of the Regulations of Connecticut Agencies, filings for rate increases must demonstrate that actual and expected losses in relation to premiums meet these standards, and anticipated loss ratios for the entire future period for which the requested premiums are calculated to provide coverage must be expected to equal or exceed the appropriate loss ratio standard.

Section 38a-473 of the Connecticut General Statutes provides that no insurer may incorporate in its rates for Medicare supplement policies factors for expenses that exceed 150% of the average expense ratio for that insurer’s entire written premium for all lines of health insurance for the previous calendar year.

II. FINDING OF FACT

After reviewing the exhibits entered into the record of this proceeding, and utilizing the experience, technical competence and specialized knowledge of the Insurance Department, the undersigned makes the following findings of fact:

1. Central States Health & Life Company of Omaha (CSO) has requested the following rate increases on its individual, and group standardized Medicare supplement plans:

<u>Plan</u>	<u>Proposed Rate Increase</u>	<u>Individual Form</u>
A	5.0%	S25
B	5.0%	S26
C	5.0%	S27
D	5.0%	S28
E	5.0%	S29
F	5.0%	S30
G	5.0%	S31

No rate change is being requested for the group forms (S48, S49, S50, S51 and S53)

2. In-force counts are as of December 31, 2014:

<u>Plan</u>	<u>Connecticut In-Force (Ind)</u>	<u>Connecticut In-Force (Grp)</u>	<u>Nationwide In-Force (Ind)</u>	<u>Nationwide In-Force (Grp)</u>
A	0	0	132	13
B	1	0	205	24
C	22	1	744	276
D	6	0	882	18
E	1	n/a	1	n/a
F	122	15	979	630
G	0	n/a	69	n/a

3. The last rate increase approved for all Plans except for Plan D was effective 9/1/06, and at a level of 12.0%, except for Plan E which was 5%. The last rate increase for Plan D was 7.0%, effective 7/1/03. The group policies had the same level of rate increases as the corresponding individual policies.
4. The subject policies were agent and broker solicited. All policy forms represent a closed block of business.
5. CSO certified that their expense factors are in compliance with section 38a-473, C.G.S.
6. CSO has conformed to subsection (e) of section 38a-495c, C.G.S. regarding the automatic claims processing requirement.
7. The proposed rates are designed to satisfy the Connecticut statutory loss ratio of 65% for individual and 75% for group.
8. The individual and group plan loss ratios, in Connecticut, for 2013, 2014 and inception-to-date are as follows, 74.75%, 79.28% and 72.20% respectively.

9. Central States 2015 Medicare supplement rate filing proposal is in compliance with the requirements of regulation 38a-474 as it applies to the contents of the rate submission as well as the actuarial memorandum.

III. RECOMMENDATION

Recommend that the rate increase of 5% be approved for all individual plans and that the group plans remain with no increase as submitted.

Dated at Hartford, Connecticut, this 3rd day of August, 2015.



Danny K. Albert
Hearing Officer