

**Genworth Life Insurance Company & Genworth Life Insurance Company of New York  
Response to MFA Single Method Exposure Data  
September 27, 2024**

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**Genworth Life Insurance Company and Genworth Life Insurance Company of New York (collectively “Genworth” or the “Company”) appreciate the opportunity for continued engagement in the MFA Single**



their annual premium exercise was the result of deteriorating experience. Any contribution from FKW would be logically unsound and inherently negate the validity of the result.

**Additional Cost-Sharing Proposals Detailed In Exposure**

Regarding the additional cost-sharing formula proposals in the most recent exposure, while Proposal A may be a compromise to the original Minnesota method, Genworth cannot support arbitrary limitations and levels not based in sound analytical or actuarial methods. The arbitrary caps detailed in Proposal B would further hinder a company's ability to manage its in-force business, and reward states which have been slow to review and approve justified increases, thereby increasing the rate increase needed to support claims-paying ability. Any cost-sharing on top of a review methodology should be discussed and decided between an individual insurer and regulator based on applicable law and unique circumstances, as stated above.

## **Appendix A**

### **Recommended questions to be answered by actuarial discussion**

- 1. Aggregate Approach** Do we agree that the Aggregate approach is the preferred approach in most cases (unless circumstances specifically require an exception to use the Simple Policy approach)?
- 2. Transparent Blending** Do we agree that the method should provide transparency between what is actuarially justified for the current request compared to the FKW component, before blending and explicit additional cost sharing is applied?
- 3. Dynamic Additional Cost Sharing** Do we agree that the additional cost sharing is not a one size fits all approach, and should be left to separate discussions between insurers and individual regulators?

**Appendix B**

**To Long-Term Care Actuarial (B) Working Group Members, Interested Regulators, and Interested Parties**

**The Working Group requests comments on the Minnesota Approach with adjustments to haircut percentages and formula**