



A REPORT BY THE SUPERINTENDENT OF FINANCIAL SERVICES
TO
THE GOVERNOR AND THE LEGISLATURE
ON
LONG TERM CARE HEALTH INSURANCE PLANS
(REPORT FOR THE TWO-YEAR PERIOD ENDING DECEMBER 31, 2020)

Adrienne A. Harris
ACTING SUPERINTENDENT



Department of Financial Services

KATHY HOCHUL
Governor

ADRIENNE A. HARRIS
Acting Superintendent

To Governor Kathy Hochul and the Legislature:

I am pleased to submit this report of the Department of Financial Services on the implementation of Chapter 245 of the Laws of 1986 permitting approval of certain long term care health insurance plans in accordance with the provisions of such act. The current report is for the two-year period ending December 31, 2020.

Respectfully submitted,

Adrienne A. Harris
Acting Superintendent of Financial Services

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Executive Summary

Purpose of this Report

Pursuant to Chapter 245 of the Laws of 1986, the Superintendent of Financial Services (Superintendent) is required to make this biennial report to the Governor and the Legislature regarding long term care (LTC) insurance, including but not limited to a description of the plans authorized, factors contributing to or impeding the development of the enrollment in such plans, the adequacy of consumer information in relation to insurance coverage for LTC services, and such recommendations as the Superintendent may deem appropriate. The current report is for the two-year period ending December 31, 2020.

General Background

The predecessor agency to the New York State Department of Financial Services (DFS), the New York State Insurance Department (Insurance Department), approved the first LTC plans in 1986. For the first two decades, the number of insurers offering such coverage remained steady. However, over the last ten to fifteen years, reflecting an apparent national trend, the number of insurers offering LTC coverage in New York State (NYS) has declined. As of the end of the reporting period, eight insurers wrote individual LTC policies and one insurer wrote group LTC policies in NYS. As of December 31, 2020, there were 62,806 persons enrolled in NYS Partnership for LTC (Partnership, described below) policies and 331,428 persons enrolled in non-Partnership policies.

Legislation and Programs to Encourage the Purchase of Coverage for Long Term Care

- In 1989, to encourage more New Yorkers to purchase LTC insurance, NYS established the Partnership program pursuant to Chapter 454 of the Laws of 1989. Under the Partnership program, NYS residents who purchase qualified LTC insurance policies will, upon exhaustion of the policy benefits, protect all or part of their assets in qualifying for Medicaid assistance. The NYS Partnership program is different than other states' Partnership programs which have been established under the federal Deficit Reduction Act of 2005 (DRA). The NYS program, the first of its kind in the nation, pre-dated the DRA programs by 16 years.
- In 1996, the federal government enacted the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. No. 104-191, 110 Stat. 1936 (1996)) which, in part, provided federal tax incentives for purchasing LTC insurance. Pursuant to the law, benefits received by a chronically ill individual under a "qualified" LTC insurance policy are excludable from income if the payments are based on actual expenses incurred.
- In 1997, pursuant to Chapter 659 of the Laws of 1997, NYS began providing favorable state income tax treatment for those persons purchasing LTC policies that qualify for the federal income tax deduction. Chapter 659 of the Laws of 1997 also promoted the development of a broader and more integrated continuum of LTC coverage, financed by a range of private, public and public/private options, including the development of continuing care retirement communities (CCRCs).

- In 1998, pursuant to Chapter 585 of the Laws of 1998 and to further encourage the purchase of LTC insurance, NYS enacted the New York Public Employee and Retiree Long Term Care Insurance Plan (NYPERL). The NYPERL offered LTC coverage to State employees, retirees and eligible family members under a group policy issued to NYS. The full cost of the plan, including coverage of eligible family members, is paid by the employee or insured person and can be deducted from the employee's salary. Local governments and other public and quasi-public employers were also allowed to participate in the NYPERL if the employer was eligible for the NYS's health insurance program and the governing body elected to participate. The NYPERL is not currently offering LTC coverage to new applicants as the existing insurer, MedAmerica Insurance Company of New York, elected not to renew its contract with NYS in 2016. A Request for Proposal released by the NYS Department of Civil Service in 2016 failed to attract a new insurer to the NYPERL. Coverage remains in effect for existing insureds under the NYPERL.
- In 2000, NYS increased the tax deduction caps by allowing businesses and individuals to take a state tax credit equal to 10% of their LTC insurance premiums (NY Tax Law Section 606(aa)). The Legislature extended the tax credit in 2002 to NYS residents covered under a federally qualified out-of-state group LTC insurance contract. In 2004, NYS's tax credit for the purchase of LTC insurance increased from 10% to 20% of premiums. In 2020, additional legislation was passed capping the tax credit for LTC insurance premiums at \$1,500 and making the tax credit only applicable to tax returns wherein adjusted gross income is below \$250,000 for taxable years beginning in 2020.
- In 2005, the Insurance Department promulgated the Second Amendment to Insurance Regulation 144 (11 NYCRR 39). The amendment provided for three new LTC insurance product designs for the Partnership program in addition to the original product design. With this regulatory amendment, two product designs provided dollar for dollar asset protection, and two product designs provided total asset protection.
- In 2011, in an effort to add an important consumer protection, DFS promulgated the Forty-Third Amendment to Insurance Regulation 62 (11 NYCRR 52), establishing an internal appeal process for LTC insurance. The internal appeal procedure permits an insured to request a review by the insurer of a claim denial for payment of benefits under the policy.
- In 2012, DFS promulgated the Third Amendment to Insurance Regulation 144 (11 NYCRR 39). The amendment made the Partnership more affordable by establishing a new 3.5% annual compound inflation benefit option, and a lower cost minimum Partnership insurance plan design that enables the insured to protect all assets upon Medicaid eligibility. The amendment also made the Partnership more marketable by requiring consumer protections for NYS Partnership insureds who moved from NYS and subsequently became eligible for asset protection under another state's Medicaid program.
- In 2013, DFS promulgated the Fourth Amendment to Insurance Regulation 144 (11 NYCRR 39), which set forth the minimum daily benefit amounts for the five Partnership plan designs from January 1, 2014 through December 31, 2023.

Factors Contributing to or Impeding the Development of Long Term Care Plans

Key factors directly affecting the development of the enrollment in LTC insurance policies in NYS include:

- 1) consumer awareness;
- 2) underwriting;
- 3) new products; and
- 4) the high cost of LTC policies.

Purpose of Report

Chapter 245 of the Laws of 1986 added Section 1117 to the NYS Insurance Law to permit certain insurers authorized by the Superintendent to issue policies providing benefits for LTC. In pertinent part, the Act provides that “on or before January first, nineteen hundred eighty-eight, and biannually thereafter, the superintendent of insurance shall report to the governor and the legislature on the implementation of this act, including but not limited to a description of the plans authorized pursuant to this act, factors contributing to or impeding the development of the enrollment in such plans, the adequacy of consumer information in relation to insurance coverage for long term care services, and such recommendations as the superintendent may deem appropriate.” The current report is for the two-year period ending December 31, 2020.

General Background

The predecessor agency to DFS, the NYS Insurance Department, first approved LTC insurance plans in 1986. In 1991, the Insurance Department promulgated the Sixteenth Amendment to Insurance Regulation 62 (11 NYCRR 52), which established minimum standards and set forth disclosure requirements for LTC insurance. The regulations took effect on January 1, 1992.

In order to allow insurers some flexibility in designing benefit packages to meet the varying needs of the public, and to provide meaningful coverage that is affordable to the greatest number of consumers, the Insurance Department established four categories of insurance policies providing LTC type benefits:

1. **LTC Insurance** provides at least 24 months of coverage which meets one of the following options:
 - Coverage of all levels of care in a nursing home of at least \$100 per day for policies sold in the New York City metropolitan area (i.e., the counties of Bronx, Kings, Nassau, New York, Queens, Richmond, Suffolk, Rockland and Westchester) and \$70 per day for all other parts of NYS. Home care coverage of at least 50% of the daily indemnity amount provided for care in a nursing home;
 - Coverage of all levels of care in a nursing home and coverage of home care, both at no less than 60% of the reasonable charge; and
 - Coverage of all levels of care in (1) a participating nursing home (one which has contracted with an insurer to provide services to its policyholders) at no less than 75% of the negotiated rate and (2) a non-participating nursing home at no less than 50% of the reasonable charge or \$55 per day, whichever is less. Coverage of home care by (1) a participating home care provider at no less than 75% of the negotiated rate and (2) a non-participating home care at no less than 50% of the reasonable charge or \$30 per day, whichever is less.

2. **Nursing Home and Home Care Insurance** provides at least 12 months of coverage for custodial care services of at least \$50 a day while confined in a nursing home and coverage for custodial care services in a private home of at least \$25 per day.

3. **Nursing Home Insurance Only** provides at least 12 months of coverage for custodial care services of at least \$50 per day in a nursing home.
4. **Home Care Insurance Only** provides at least 12 months of coverage for custodial care services of at least \$25 per day in a private home.

For all categories, the Insurance Department mandated the offering of the following additional benefits:

- **An inflation protection benefit.** An insurer must offer an insured one of the following three options:
 - 1) Five percent compound inflation (lower percentages are also permitted);
 - 2) Increased benefit levels in proportion to the increase in the Consumer Price Index for All Urban Consumers published by the Bureau of Labor Statistics, compounded annually; or
 - 3) Guaranteed purchase option (insurer periodically offers increased benefit levels without providing evidence of insurability or health status so long as the insured has not declined the option three consecutive times).
- **A nonforfeiture benefit.** An insurer must offer an insured the option to purchase a rider that provides a reduced benefit upon policy lapse, without the insured having to pay any additional premium.

As of the end of the reporting period, eight insurers wrote individual LTC insurance policies and one insurer wrote group LTC insurance policies in NYS. (See the chart below for details.)

Authorized Long Term Care Insurers

The following chart identifies the insurers currently offering LTC type coverage to New Yorkers as of the end of the reporting period¹:

Insurer	Individual	Group
	NP	NP
Bankers Conseco Life Insurance Company	X	
Genworth Life Insurance Company of New York	X	X
Knights of Columbus	X	
Massachusetts Mutual Life Insurance Company	X	
Mutual of Omaha Insurance Company	X	
New York Life Insurance Company	X	
Northwestern Long Term Care Insurance Company	X	
Transamerica Financial Life Insurance Company	X	
NP = Non-partnership coverage		

¹ Data regarding closed blocks of business can be found in Appendices.

Legislation and Programs to Encourage the Purchase of Coverage for Long Term Care

Tax Incentives – Federal

In 1996, the federal government enacted the Health Insurance Portability and Accountability Act (HIPAA) which, in part, provided federal tax incentives for purchasing LTC insurance. Pursuant to the law, benefits received by a chronically ill individual under a “qualified” LTC insurance policy are excludable from income if the payments are based on actual expenses incurred.

Generally, for 2021, benefits received under “qualified” policies that pay on an indemnity basis are excludable from income so long as the benefit payments do not exceed \$400 per day and are not in excess of the actual expenses. These caps will be indexed for inflation. Payments in excess of the cap are excludable from income only to the extent of actual costs incurred for LTC services. Amounts received in excess of the dollar cap for which no actual costs were incurred for LTC services are fully includable in income.

Individuals who itemize on their tax returns should be aware that, under HIPAA, premiums for “qualified” LTC insurance policies are treated as medical expenses for purposes of itemized deductions (medical expenses must be more than 10% of adjusted gross income to qualify for the deduction). The maximum amounts deductible in 2021 are set forth in the table below.

In the case of an individual with an attained age before the close of the taxable year of:	The annual maximum deductible amount is:
40 or less	\$450
41 to 50	\$850
51 to 60	\$1,690
61 to 70	\$4,520
71 & Over	\$5,640

Under HIPAA, for a LTC insurance policy to be qualified for the favorable tax treatment, the policy must meet the following requirements:

- Provide only coverage of qualified LTC services;
- Generally not pay or reimburse expenses incurred for services or items that would be reimbursed under Medicare, except where Medicare is a secondary payer, or where the contract makes per diem or other periodic payments without regard to expenses subject to federal interpretation of special rules in HIPAA;
- Be guaranteed renewable;
- Provide that refunds (other than refunds on the death of the insured or complete surrender or cancellation of the policy) and dividends under the policy must be used only to reduce future premiums or increase future benefits; and
- Not provide for a cash surrender value or other money that can be paid, assigned, pledged or borrowed.

HIPAA also provides that any policy issued before January 1, 1997, which meets the LTC insurance requirements of the state in which the policy was issued, will be treated as federally

“qualified” LTC insurance policy for federal tax purposes, and services provided under the policy will be treated as qualified LTC services. The “grandfather” status for policies issued before January 1, 1997 will continue so long as there is no “material change” in the policy on or after January 1, 1997 within the meaning of federal law.

Tax Incentives – State

NYS has also encouraged the purchase of LTC insurance by enacting legislation that provides favorable state income tax treatment for those persons purchasing LTC policies that qualify for the federal income tax deduction. In 1997, pursuant to Chapter 659 of the Laws of 1997, premiums paid for “qualified” LTC policies were deductible to the same extent as under the federal law. The deduction in NYS was taken from federal adjusted gross income. This deduction, therefore, was available even to those taxpayers who did not itemize their deductions. Benefits received under federally “qualified” LTC policies were excluded from income on the same basis as under the federal law.

In 2000, NYS repealed this tax deduction for LTC insurance premiums and instead provided for a tax credit equal to 10% of LTC insurance premiums for taxable years beginning January 1, 2002. Also, in 2002, NYS amended its Tax and Insurance Laws to permit NYS residents covered under a federally qualified out-of-state group LTC insurance contract to deduct or receive a tax credit equal to 10% of the premium paid on their state income tax returns. Prior to this legislation, a NYS resident’s premium payment had to be for the purchase of a LTC insurance policy, approved in NYS by the Superintendent of Insurance, in order to deduct or receive the tax credit. In 2004, legislation was enacted increasing the tax credit for LTC insurance premiums from 10% to 20% for tax years beginning in 2004. Additional legislation was passed in 2020 capping the tax credit for long term care insurance premiums at \$1,500 and making the tax credit only applicable to tax returns wherein adjusted gross income is below \$250,000 for taxable years beginning in 2020.

Thus, a NYS resident who pays \$3,000 in premiums for a tax qualified LTC insurance policy in tax year 2021 would receive a NYS tax credit in the amount of \$600 on their 2021 NYS income tax return. This tax credit translates into a direct dollar-for-dollar reduction of the amount of income tax owed to NYS.

Continuing Care Retirement Communities

In an effort to promote the development of a broader and more integrated continuum of LTC, financed by a range of private, public and public/private options, NYS amended the Public Health Law in 1997 to allow a continuing care retirement community (CCRC) the flexibility to offer more cost-conscious options of contracts such as a Type B contract. In addition to establishing a process for approval of CCRCs, the Public Health Law also provided for the following:

- Streamlining the approval process for residential health care facility beds and licensed home care service agencies operated as part of a CCRC;
- Establishing a comprehensive and flexible statutory and regulatory framework for an increased number of demonstration programs providing managed care for the elderly and chronically ill population who would not otherwise be served in a special needs plan or other managed care program;

- Making the LTC security demonstration program permanent; and
- Permitting accelerated payment of death benefits under a life insurance policy when the insured is chronically ill and requiring LTC services for the duration of their life.

Four different types of CCRC contracts are authorized for sale in NYS. Type A is all-inclusive, Type B provides modified services, Type C requires fee for service, and Type D provides care at home.

- 1) **Type A** contracts provide housing, residential services, many amenities and unlimited, specific health-related services, including LTC services. If the resident’s health deteriorates to the point that they need LTC services or admission to the nursing home, all of the services covered under the contract are provided without an increase in the monthly fee (except for normal operating costs and inflation adjustments). The monthly fee also will not increase due to the amount of services the resident requires.
- 2) **Type B** contracts provide housing, residential services and many amenities. This contract differs from the Type A contract in the amount of LTC services that will be provided before an adjustment is made in the amount of the monthly fee paid by the resident. For example, under this type of contract, the CCRC could allow residents a specified number of days in a nursing home without a change in the monthly fee. Once this limit is reached, the resident could be required to pay for continued nursing home services on a full per diem basis or a discounted per diem basis.
- 3) **Type C** contracts cover housing, residential services and amenities under the entrance fee and/or monthly fee in the same way as Type A and B contracts. This contract differs from the other two types of contracts in that all other health related services, including nursing home care, are paid for by the resident as they are needed on a fee for service basis. Under this type of contract, the resident pays lower fees upon entry, but in turn accepts the risk of paying for the care needed.
- 4) **Type D** contracts allow CCRCs to offer individuals an additional care option. This type of contract provides the traditional services and benefits of CCRCs while allowing individuals to remain in their own homes and receive home care prior to moving to the CCRC campus. Type D contracts are not currently offered by a CCRC in NYS, but a few CCRCs have indicated an interest in offering this contract type in the future.

As of the end of the reporting period, 11 CCRCs have received a Certificate of Authority from the Commissioner of Health and are operating under Article 46 of the Public Health Law:

<u>Name</u>	<u>County</u>	<u>Living Facilities</u>
The Amsterdam at Harborside 300 East Overlook Port Washington, NY 11050 516-472-6636 www.theamsterdamatharborside.com	Nassau	Independent living units, enriched housing units, nursing home beds

<u>Name</u>	<u>County</u>	<u>Living Facilities</u>
Canterbury Woods 705 Renaissance Dr. Williamsville, New York 14221 716-929-5817 www.canterburywoods.org/home.html	Erie	Independent living units, enriched housing units, nursing home beds
Fox Run at Orchard Park One Fox Run Lane Orchard Park, NY 14127 716-662-5001 www.foxrunorchardpark.com	Erie	Independent living units, enriched housing units, nursing home beds
Glen Arden, Inc. 214 Harriman Drive Goshen, NY 10924 845-360-1400 www.glenardenny.com	Orange	Independent living units, enriched housing units, nursing home beds
Jefferson's Ferry 1 Jefferson Ferry Drive S. Setauket, NY 11720-9800 631-650-2600 www.jeffersonsferry.org	Suffolk	Independent living units, enriched housing units, nursing home beds
Kendal on Hudson 1010 Kendal Way Sleepy Hollow, NY 10591 914-922-1000 www.kohud.kendal.org	Westchester	Independent living units, enriched housing units, nursing home beds
Kendal at Ithaca 2230 N. Triphammer Road Ithaca, NY 14850 800-253-6325 www.kai.kendal.org	Tompkins	Independent living units, enriched housing units, nursing home beds
Peconic Landing at Southold, Inc. 1500 Brecknock Road Greenport, NY 11944 888-273-2664 www.peconiclanding.org	Suffolk	Independent living units, enriched housing units, nursing home beds
Summit at Brighton 2000 Summit Circle Drive Rochester, NY 14618 585-442-4500 www.summitbrighton.org	Monroe	Independent living units, enriched housing units, nursing home beds
The Knolls 55 Grasslands Road Valhalla, New York 10595 914-461-4500 www.theknolls.org	Westchester	Independent living units, enriched housing units, nursing home beds
Woodland Pond at New Paltz 100 Woodland Pond Circle New Paltz, NY 12561 877-505-9800 www.wpatnp.org	Ulster	Independent living units, enriched housing units, nursing home beds

The New York State Partnership for Long Term Care Insurance

In an effort to encourage more New Yorkers to purchase LTC insurance, NYS established the NYS Partnership for Long Term Care Program (Partnership) pursuant to Chapter 454 of the Laws of 1989. The Partnership became operational in March 1993. The Partnership provides that NYS residents who purchase a qualified policy or certificate providing LTC insurance will become eligible for Medicaid assistance without spending down their assets once the benefits from the policy or certificate are exhausted. Income, however, would still be contributed toward the cost of care in accordance with regular NYS Medicaid rules.

Under the original Partnership, the Insurance Department promulgated Insurance Regulation 144 (11 NYCRR 39), which established minimum standards for a qualified policy or certificate under the program.

The minimum standards and benefit levels under the Partnership are more stringent than the minimum standards for non-Partnership policies, in order to protect the viability of the NYS Medicaid program which is legally bound to provide benefits on a special eligibility basis after the benefits of the qualified LTC policy or certificate are exhausted.

To be approved under the Partnership, LTC insurance policies must contain the following minimum benefits:

- A lifetime maximum.
 - i. Nursing home benefit of at least 1½ or 2 years providing at least \$337 per day for 2020, and increasing by at least 3.5% (with an insured option to choose 5%) compounded annually. Home care coverage must be provided in an amount that is 50% of the minimum required nursing home care benefit (\$168 per day in 2020) and is payable when services are provided in the insured's home, in a group setting such as an adult day care center, or where human assistance is needed to aid the insured in necessary travel, such as to a physician's office; or
 - ii. Nursing home benefit of either 2 or 4 years providing at least \$337 per day for 2020, and increasing by at least 3.5% (with an insured option to choose 5%) compounded annually. The home care daily benefit amount is the same as the nursing home benefit rather than 50% of the nursing home benefit as described in the first option above.
- Bed reservation benefits, respite care, hospice care, care management and alternate care. Waiting periods for the 1½ or 2-year plans cannot exceed 60 days, and waiting periods for the 2 or 4-year plans cannot exceed 100 days.

Total asset protection is available with Partnership policies providing 2 or 4 years of benefits. Upon exhaustion of the benefits in the 2 or 4-year total asset plan designs, the insured is able to apply for Medicaid and protect all of their assets. Dollar for dollar Partnership policies that provide 1½ or 2 years of nursing home benefits provide dollar for dollar asset protection which means that for every dollar of benefits covered under those policies, a dollar of assets will be protected. For all Partnership plan designs, income must be contributed toward the cost of LTC services in accordance with Medicaid rules.

The 1½, 2 and 4-year plans must all be written to qualify for favorable federal and NYS income tax treatment. The original 3-year plan may be written as qualifying for favorable federal and NYS income tax treatment, or it may be written as non-tax qualified (3-year plans issued before January 1, 1997 were issued before tax qualification standards existed, and thus they may be considered tax qualified if federal requirements are met).

As of the end of the reporting period, 84% of the total market for long term care insurance was comprised of non-Partnership policies and 16% was comprised of Partnership policies.

New York Public Employee and Retiree Long Term Care Insurance Plan (NYPERL)

In 1998, pursuant to Chapter 585 of the Laws of 1998 and to further encourage the purchase of LTC insurance, NYS enacted the New York Public Employee and Retiree Long Term Care Insurance Plan (NYPERL). The NYPERL offered two tax-qualified benefit designs: the Partnership option, which after the exhaustion of either a two or three-year nursing home benefit provides for coverage of LTC expenses under the State's Medicaid program; and a non-Partnership option, which provides benefits based upon a three-year or five-year benefit period that is selected by the insured at the time of application. The NYPERL is a group LTC insurance policy administered by the NYS Department of Civil Service with coverage provided by MedAmerica Insurance Company of New York.

Participation in the plan was at the option of the employee. All State employees and retirees who were eligible or became eligible for participation in the New York State Health Insurance Plan were also eligible to participate in the NYPERL. Local governments and other public and quasi-public employers were able to participate in the NYPERL if the employer was eligible for the State's health insurance program and the governing body elected to participate. Coverage remains in effect for employees who terminate employment while participating in the plan so long as they continue paying premiums. The full cost of the plan, including coverage of eligible family members, is paid by the employee or insured person and can be deducted from the employee's salary. Employees who terminate employment while participating in the plan will have the option to continue the coverage or convert it to an individual policy.

As of the end of the reporting period, the NYPERL was not offering LTC coverage to new applicants as the existing insurer, MedAmerica Insurance Company of New York, elected not to renew its contract with NYS in 2016. A Request for Proposal released by the NYS Department of Civil Service in 2016 failed to attract a new insurer to the NYPERL. Coverage remains in effect for existing insureds under the NYPERL.

Factors Contributing to or Impeding the Development of Long Term Care Plans

In order for DFS to better understand the factors affecting the development of the LTC insurance market, DFS previously distributed a questionnaire to several LTC insurers. The questionnaire asked general questions about LTC insurance and the LTC insurance market, and invited insurers to elaborate on their responses so DFS could gather more information about innovations that could rejuvenate the LTC insurance market. Insurers most often cited the following four factors affecting the development of and enrollment in LTC insurance coverage in NYS: (1) consumer awareness, (2) underwriting, (3) new products, and (4) high cost of LTC insurance coverage. These are described in more detail below. However, responses from insurers did not provide extensive information or ideas on innovations that could rejuvenate the market.

1) Consumer Awareness

LTC insurers continue to report consumers' lack of awareness of the need for LTC insurance and the misperception that medical insurance, Medicare and/or Medicaid will cover these services. One insurer stressed that there needs to be a regular program of consumer outreach, sponsored by NYS and/or the federal government, regarding the need to plan for LTC. Many individuals will voluntarily seek out information regarding LTC planning when there is an event within their own family but waiting for that moment to happen and hoping that the individual is still insurable or has the financial means to plan is not a reasonable way to create more awareness and demand for solutions. Another issue mentioned by insurers as affecting the successful marketing of LTC insurance is that LTC is a subject that makes many people uncomfortable. People often refuse to believe they will need LTC and therefore refuse to plan for future LTC expenses.

A great deal of information is available to consumers about LTC insurance plans if they seek it out. DFS's website offers information on LTC insurance and CCRCs. DFS also periodically updates the consumer guide entitled, "A Consumer's Guide to Long Term Care Insurance," which, among other things provides information on benefits and features available in the NYS market. The Partnership publishes the "New York State Partnership for Long Term Care Brochure" and a consumer brochure entitled "Medicaid Eligibility and the Treatment of Income and Assets under the New York State Partnership for Long Term Care." These publications are updated periodically and are available from the Partnership Office at the NYS Department of Health. The Partnership Office at the NYS Department of Health can be found here: <https://nyspltc.health.ny.gov/>

Publications are also issued by entities other than state government that highlight the differences between Medicare, Medicaid and LTC insurance. A publication developed jointly by the National Association of Insurance Commissioners (NAIC) and the Centers for Medicare and Medicaid of the U.S. Department of Health and Human Services entitled "Choosing a Medigap Policy: A Guide to Health Insurance for People with Medicare" contains information indicating that Medigap policies do not cover LTC. This guide is updated periodically and is available on the DFS website at:

https://www.dfs.ny.gov/consumers/health_insurance/information_for_medicare_beneficiaries.

The NAIC also has available "A Shopper's Guide to Long-Term Care Insurance," which provides guidance on LTC insurance, as well as worksheets to assist consumers in obtaining information about the availability and cost of LTC services. This guide is also updated periodically and is available on the DFS website at

https://www.dfs.ny.gov/consumers/health_insurance/long_term_care_insurance. In addition to efforts by government agencies and the NAIC, it is also incumbent for insurers to be proactive. Insurers must engage consumers about the importance and need for LTC insurance.

As noted, both federal and NYS laws provide for favorable tax treatment for the purchase of qualified LTC insurance policies. Insurers have indicated that the NYS tax credit has a larger impact on promoting LTC insurance purchases than the more limited favorable federal tax deduction. Insurers also believe that publicity generated by the enactment of federal and state laws providing for favorable tax treatment for qualified LTC policies has helped focus the public's attention on LTC issues. Insurers in general feel that the favorable tax treatment sends a positive message to consumers. Additionally, numerous insurers reported that they would like to see the federal and NYS tax incentives increased. Many insurers believe that more robust tax

incentive programs would lead to a greater number of individuals covered by LTC insurance policies.

For individuals, the federal deduction allows LTC insurance premiums to be deducted if the insured's medical expenses exceed 10% of their adjusted gross income. If an "above-the-line"² deduction was allowed, it would provide an incentive for many more people to purchase LTC coverage. Insurers believe that pre-tax deductibility for LTC premiums and the inclusion of group LTC insurance in Cafeteria Plans (Section 125 of the Internal Revenue Code) would also have a major impact on encouraging sales of LTC insurance.

Most insurers also indicated to DFS that the NYS tax credit is an important incentive to the sale of LTC coverage. Some companies use the tax incentives in their marketing materials, with brochures highlighting the NYS tax credit and favorable federal tax treatment. Several insurers educate their agents about the NYS tax credit, who in turn provide the information to consumers during marketing or sale.

Insurers also indicated that Medicaid estate planning is an impediment to the development of LTC insurance in NYS. Generally, assets of a Medicaid applicant and their spouse (if married) are considered for Medicaid eligibility purposes. Medicaid estate planning involves the transferring or sheltering of those assets to access Medicaid for coverage of the consumer's LTC needs. This transferring or sheltering of a consumer's assets allows a consumer to meet the asset test for Medicaid eligibility and receive LTC services without having to "spend down" their assets prior to becoming Medicaid eligible. As of the end of the reporting period, the asset test for Medicaid eligibility included a five-year look-back period. Many consumers see the use of Medicaid estate planning as a viable alternative to purchasing LTC insurance for their LTC needs.

2) Underwriting

LTC insurance coverage relies heavily upon various actuarial assumptions, including lapse rate, morbidity (need for benefits), and mortality (lifespan). Many insurers overestimated lapse rates and underestimated morbidity and mortality when initially pricing LTC coverage in the 1980s. In addition, the cost of care has risen significantly. As a result, and in retrospect, most LTC coverage was underpriced when it was first sold. Today, LTC insurers can price LTC coverage more accurately because of the more credible data. Consequently, initial premium rates have increased substantially and priced many individuals out of the market.

3) New Products

Due to the numerous issues with traditional stand-alone LTC insurance, insurers and DFS have recognized the need for innovation. In 2005, the Insurance Department promulgated an amendment to Insurance Regulation 143 (11 NYCRR 41) that allows insurers to offer consumers the option of accelerating the death benefit under a life insurance policy when the insured is chronically ill and may need additional financial resources to assist with meeting LTC needs and expenses. Access to existing resources such as the death benefit of a life insurance policy and the ability for insurers to provide for alternate ways to meet consumer's increasing LTC needs have become more necessary. The standards set forth by the regulation provide proper

² An "above-the-line" deduction allows an individual to deduct certain expenses without itemizing them. These deductions can be claimed whether an individual itemizes deductions or takes the standard deduction.

disclosure to consumers and ensure the favorable federal tax treatment for payment of the benefits. A few insurers have also explored whether to add an LTC rider to pay additional LTC benefits after the accelerated death benefit rider has been exhausted. These combination products provide more LTC benefits after the death benefit of the life insurance policy is exhausted. As of the end of the reporting period, multiple insurers offered a joint life insurance policy with an accelerated death benefit rider and additional LTC insurance rider.

Additionally, under the federal Pension Protection Act of 2006, the same favorable federal tax treatment granted to stand-alone LTC insurance was extended to combination annuity and LTC insurance products. DFS has received a few inquiries from insurers expressing interest in offering a combination annuity/LTC insurance product. As of the end of the reporting period, one insurer offered a combination annuity/LTC insurance product.

4) High Cost of LTC Coverage

In recent years, many insurers have raised premium rates on LTC policies. Premium rate increases have been implemented nationally and in NYS. While DFS understands consumers' frustration and the financial difficulties caused by recent LTC premium rate increases, these increases were necessary and actuarially justified. At the time that sales of LTC insurance began, it was a new insurance product with no claims experience to draw from in establishing premium rates. Unfortunately, many of the initial assumptions used by insurers later proved to be incorrect. The lack of credible experience and flawed assumptions, coupled with rising healthcare costs and increased life expectancy, led to insufficient premiums. As a result, insurers have demonstrated the actuarial need for premium rate increases.

DFS seeks to minimize the impact of LTC premium rate increases on consumers, and reminds insurers that they should be providing insureds the ability to change certain benefits, such as lowering their daily benefit amount, increasing their elimination period, or reducing their lifetime benefit maximum, at any time. All these options give insureds the ability to mitigate LTC premium rate increases and have an LTC policy that meets their needs.

General Recommendations

LTC insurance is an alternative to Medicaid for consumers seeking to finance LTC services. To further encourage the development and purchase of such policies, DFS makes the following recommendations:

- The LTC insurance industry should be encouraged to take the following actions:
 - Emphasize the marketing and sale of basic LTC type coverage to a younger demographic that would also be affordable for more middle-class New Yorkers; and
 - Offer innovative LTC products, such as combination life insurance/LTC riders, designed to keep premiums affordable while still providing meaningful LTC benefits for New Yorkers.
- DFS, the NYS Department of Health, and the NYS Office for the Aging should continue efforts to encourage the purchase of LTC policies, including those qualifying under the Partnership.

- NYS should increase its efforts to educate the public about the benefits of LTC insurance, including the existence of NYS’s tax credit for LTC premiums that provides a substantial tax benefit. Essentially, NYS will support and encourage its taxpayers to plan for future LTC expenses by paying 20% of the bill for LTC insurance premiums. This credit is available to any NYS taxpayer paying LTC insurance premiums, including adult children who pay for coverage on behalf of their parents. The NYS tax credit for LTC insurance premiums is capped at \$1,500 and the tax credit is only applicable to tax returns wherein adjusted gross income is below \$250,000 for taxable years beginning in 2020.
- The federal government should be encouraged to take the following actions:
 - Allow an above-the-line deduction or tax credit for LTC insurance premiums;
 - Permit 401(k) or Individual Retirement Account holders to take a distribution from their retirement account to fund the purchase of LTC without an early withdrawal penalty;
 - Allow LTC Savings Accounts similar to Health Savings Accounts;
 - Provide funding for a federal education campaign around retirement security/planning for LTC needs;
 - Allow LTC insurance to qualify as part of a Cafeteria Plan under Section 125 of the Internal Revenue Code to allow a before-tax deduction for insurance premiums; and
 - Extend the Medicaid five-year look-back period (e.g., to ten years).

Further, DFS will take the following actions:

- Continue to review the minimum standards for the form, content and sale of LTC insurance and amend the standards as necessary to incentivize the sale of meaningful LTC insurance to as many New Yorkers as possible;
- Continue to encourage insurers’ development of innovative LTC products designed to keep premiums affordable while still providing meaningful LTC benefits for New Yorkers;
- Continue to periodically update DFS’s “A Consumer Guide to Long Term Care Insurance in New York”;
- Continue to work with the NYS Department of Health and the NYS Office for the Aging in publicizing and answering questions from the public on the Partnership;
- Continue to provide information and assistance to senior citizens concerning LTC insurance and other coverage available, such as Medicare supplement insurance;
- Continue to encourage insurers’ development of combination products which combine life insurance or annuities with a rider that provides LTC type services; and
- Continue to require that insurers provide their insureds the ability to offset significant LTC premium rate increases using “landing spots” and other mitigating options.

APPENDIX I

Total In-force Long-Term Care Policies with Market Share as of December 31, 2020

Insurer	Non-Partnership	Partnership	Total Insureds	% of Market
Aetna Life Insurance Company	3,376	0	3,376	0.86%
Allianz Life Insurance Company of New York	955	0	955	0.24%
American Family Life Assurance of New York (AFLAC)	136	1	137	0.03%
American Independent Network Insurance Company of New York	789	0	789	0.20%
American Progressive Life and Health Insurance Company of New York	692	60	752	0.19%
Athene Insurance Company of New York (including Aviva Life & Annuity Company of New York)	92	242	334	0.08%
Bankers Consec Life Insurance Company (previously Consec)	4,140	659	4,799	1.22%
Berkshire Life Insurance Company of America	2,355	0	2,355	0.60%
Brighthouse Life Insurance Company (previously Travelers and MetLife USA)	12,204	3,656	15,860	4.02%
Combined Life Insurance Company of New York	74	0	74	0.02%
Continental Casualty Company (CNA)	15,738	4,185	19,923	5.05%
Excellus Health Plan, Inc. (previously Blue Cross Blue Shield)	1	0	1	0.00%
First Unum Life Insurance Company	38,654	0	38,654	9.80%
Genworth Life Insurance Company of New York (previously GE Capital Life Assurance Company of New York)	52,953	24,560	77,513	19.66%
Globe Life Insurance Company of New York (previously First United American Life Insurance Company)	13	0	13	0.00%
Insurance Company of North America (including Connecticut General and CIGNA)	92	0	92	0.02%
John Hancock Life and Health Insurance Company	29,443	15,218	44,661	11.33%
John Hancock Life Insurance Company (USA)	11,679	81	11,760	2.98%
Knights of Columbus	1,261	0	1,261	0.32%
Massachusetts Mutual Life Insurance Company	6,732	341	7,073	1.79%
MedAmerica Insurance Company of New York	13,533	6,721	20,254	5.14%
Metropolitan Life Insurance Company	63,129	5,392	68,521	17.38%
Mutual of Omaha	9,839	36	9,875	2.50%
New York Life Insurance Company	11,677	170	11,847	3.42%
Northwestern Long Term Care Insurance Company	13,502	0	13,502	3.42%

Insurer	Non-Partnership	Partnership	Total Insureds	% of Market
Principal Life Insurance Company	44	0	44	0.01%
Provident Life and Casualty Insurance Company	95	0	95	0.02%
Prudential Insurance Company of America	24,459	98	24,557	6.23%
River Source Life Insurance Co. of NY	4,722	0	4,722	1.20%
State Farm Mutual Automobile Insurance Company	1,535	0	1,535	0.39%
Talcott Resolution Life Insurance Company (previously Hartford Life Insurance Company)	8	0	8	0.00%
Teachers Insurance and Annuity Association of America	749	25	774	0.20%
Thrivent Financial for Lutherans (previously Aid Association for Lutherans)	228	0	228	0.06%
TIAA-Cref Life Insurance Company	419	0	419	0.11%
Transamerica Financial Life Insurance Company (including AUSA)	3,444	20	3,464	0.88%
Union Security Life Insurance Company (previously First Fortis)	2,339	1,341	3,680	0.93%
The United States Life Insurance Company In The City Of New York (American International Life Assurance Company of New York)	298	0	298	0.08%
VOYA Retirement Insurance and Annuity Company	29	0	29	0.01%
TOTALS	331,428	62,806	394,234	100%

All data provided has been self-reported by the insurers and has not been verified by DFS.

APPENDIX II

Number of Non-Partnership LTC Policies In-force in New York as of December 31, 2020

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
Aetna Life Insurance Company	60054	GR-700	12/14/1994		X	55	1312	1175	787	101	1	0	0	3376
		TOTALS		0	1	55	1,312	1,175	787	101	1	0	0	3,376
Allianz Life Insurance Company of New York	64190	10-P-Q-NY	10/3/2005	X		952	15	129	518	242	48	0	0	952
		GSC-1880-PL-1.0	5/8/1992		X	1	0	0	0	0	3	0	0	3
		TOTALS		1	1	953	15	129	518	242	51	0	0	955
American Family Life Assurance of New York (AFLAC)	60526	NY-20000	3/15/1991	X		0	0	0	0	0	0	0	0	0
		NY-21000	1/21/1992	X		18	0	3	8	7	0	0	0	18
		NY-22000	1/21/1992	X		4	0	0	0	4	0	0	0	4
		NY-26000	6/14/1995	X		0	0	0	0	0	0	0	0	0
		NY-27000	9/16/2002	X		92	21	56	36	1	0	0	0	114
		TOTALS		5	0	114	21	59	44	12	0	0	0	136
American Independent Network Insurance Company of New York	60243	PF2600(NY)	10/28/1998	X		265	3	50	128	79	5	0	0	265
		LTCTP-6500(NY)-AI	10/4/2000	X		84	0	12	38	33	1	0	0	84
		ALP1(NY)	10/12/1999	X		14	0	1	6	7	0	0	0	14
		ALP2(NY)	10/12/1999	X		5	0	2	2	1	0	0	0	5
		ALP1(NY)-TQ	10/21/1999	X		13	0	2	5	6	0	0	0	13
		ALP2(NY)-TQ	10/21/1999	X		9	0	2	5	1	1	0	0	9
		IL4-1(NY)	2/15/2000	X		234	2	18	72	116	26	0	0	234
		IL4-2(NY)	2/15/2000	X		13	0	3	4	6	0	0	0	13
		IL4-1-TQ(NY)	2/25/2000	X		73	0	4	27	31	11	0	0	73
		IL4-2-TQ(NY)	2/25/2000	X		11	0	3	2	5	1	0	0	11
		PF3(NY)	7/19/2005	X		2	0	0	2	0	0	0	0	2
		PF3-TQ(NY)	7/19/2005	X		62	1	8	35	16	2	0	0	62
		SR1-1AI(NY)	6/12/2008	X		1	0	1	0	0	0	0	0	1
		SR2-1AI(NY)	6/12/2008	X		3	0	0	2	1	0	0	0	3
TOTALS		14	0	789	6	106	328	302	47	0	0	789		

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
American Progressive Life and Health Insurance Company of New York	80624	APRLTNQ (3/99) NY	6/30/1999	X		29	4	2	16	7		0	0	29
		APRLTCQ (3/99) NY	6/30/1999	X		65	8	17	16	23	1	0	0	65
		ANH-86	1986	X		1			1			0	0	1
		CERT-HHC	7/97	X		8				7	1	0	0	8
		CERT-NHHH	7/97	X		2		1	1			0	0	2
		CERT-NHO	7/97	X		1			1			0	0	1
		HHC 1/98	1/98	X		306	1	11	67	185	42	0	0	306
		HHC-800	3/95	X		81		2	33	44	2	0	0	81
		NHHH-700	7/96	X		26		6	13	6	1	0	0	26
		NHO-700	7/96	X		12			6	6		0	0	12
		PR-NHO	10/00	X		17		1	10	5	1	0	0	17
		PR-NHOQ	10/00	X		41		9	24	8		0	0	41
		QC-HHC	7/97	X		7			2	5		0	0	7
		QI-HHC	7/97	X		65		3	20	37	5	0	0	65
		QI-NHHH	7/97	X		13		3	4	6		0	0	13
		QI-NHO	7/97	X		18			5	12	1	0	0	18
TOTALS				16	0	692	13	55	219	351	54	0	0	692
Athene Insurance Company of New York (including Aviva Life & Annuity Company of New York)	63932	NY- 5762-P	2/17/1995	x		75	5	27	35	8	0	0	0	75
		NY- 5762-P (Q)	2/27/1995	x		17	1	9	6	1	0	0	0	17
		TOTALS				2	0	92	6	36	41	9	0	0

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval	I	G		Under 45	45-54	55-64	65-74	75 and Over			
Bankers Conseco Life Insurance Company <i>(previously Conseco)</i>	68560	ATIC-FQ-LTC-NY	3/4/1998	X		693	8	175	409	256	12	0	0	860
		ATIC-LTC-6-NY	1/13/1997	X		178	3	19	114	74	2	0	0	212
		ATIC-LTC-6B-NY	5/31/1997	X		47	0	4	26	22	0	0	0	52
		ATIC-LTC-10-NY	10/8/1996	X		5	0	1	2	3	1	0	0	7
		BLNY - GR-N500	9/12/2007	X		738	0	34	241	479	89	0	0	843
		BLNY - GR-N520	4/28/2006	X		18	0	0	7	14	3	0	0	24
		BLNY - GR-N540	4/28/2006	X		1	0	0	1	0	0	0	0	1
		BLNY - GR-N550	4/28/2006	X		139	6	21	69	70	6	0	0	172
		BLNY - GR-N620	5/18/2011	X		33	2	1	16	13	1	1	0	33
		BLNY - GR-N640	5/18/2011	X		15	0	0	2	13	1	0	0	16
		BLNY - GR-N650	5/18/2011	X		182	17	36	65	60	4	16	1	182
		BLNY - GR-N660	11/12/2015	X		42	0	2	11	22	7	5		42
		BLNY - GR-N665	11/12/2015	X		1,696	0	54	591	944	107	400	37	1,696
TOTALS				13	0	3,787	36	347	1,554	1,970	233	422	38	4,140
Berkshire Life Insurance Company of America	71714	BG01P(06/04)-NY	3/30/2004	x		1064	165	694	719	107	3	0	0	1688
		BG02P(06/04)-NY	3/30/2004	x		4	0	1	4	0	0	0	0	5
		BG03P(06/04)-NY	3/30/2004	x		343	136	190	216	24	0	0	0	0
		BG04P(06/04)-NY	3/30/2004	x		0	0	0	0	0	0	0	0	0
		BG05P(06/04)-NY	3/30/2004	x		42	41	21	13	2	0	0	0	77
		BG06P(06/04)-NY	3/30/2004	x		1	1	0	0	0	0	0	0	1
		BG01P(01/09)-NY	4/15/2004	x		321	48	158	255	28	2	0	0	491
		BG02P(01/09)-NY	4/15/2004	x		0	0	0	0	0	0	0	0	0
		BG03P(01/09)-NY	4/15/2004	x		58	27	30	28	3	0	0	0	88
		BG04P(01/09)-NY	4/15/2004	x		0	0	0	0	0	0	0	0	0
		BG05P(01/09)-NY	4/15/2004	x		3	0	2	3	0	0	0	0	5
		BG06P(01/09)-NY	4/15/2004	x		0	0	0	0	0	0	0	0	0
TOTALS				12	0	1,836	418	1,096	1,238	164	5	0	0	2,355

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
Brighthouse Life Insurance Company (previously Travelers and MetLife USA)	87726	LTC1	5/6/1989	X		3	0	1	2	0	0	0	0	3
		LTC2	3/18/1991	X		7858	156	1522	4097	2032	51	0	0	7858
		LTC4	12/30/1997	X		4343	90	903	2385	937	28	0	0	4343
		TOTALS		3		12,204	246	2,426	6,484	2,969	79	0	0	12,204
Combined Life Insurance Company of New York	78697	D44533 et al	9/8/1998	X		74	5	16	34	16	3	0	0	74
		TOTALS		1	0	74	16	34	16	3	0	0	0	74
Continental Casualty Company (CNA)	20443	P1-15203-A31	12/13/1991	x		503	5	196	241	61	0	0	0	503
		P1-16356-A31	12/13/1991	x		28	0	16	12	0	0	0	0	28
		P1-18876-A31	5/4/1995	x		95	3	24	47	20	1	0	0	95
		P1-18878-A31	5/4/1995	x		4	0	1	2	1	0	0	0	4
		P1-21295-A31	5/19/1995	x		218	6	47	120	42	3	0	0	218
		P1-21300-A31	5/19/1995	x		509	17	145	270	77	0	0	0	509
		P1-21305-A31	5/19/1995	x		5	1	0	2	2	0	0	0	5
		P1-59806-A31	11/23/1988	x		116	0	41	66	9	0	0	0	116
		P1-N0022-A31	2/28/1997	x		600	8	113	326	147	6	0	0	600
		P1-N0023-A31	2/28/1997	x		1	0	0	0	1	0	0	0	1
		P1-N0026-A31	2/28/1997	x		1480	33	366	804	273	4	0	0	1480
		P1-N0027-A31	2/28/1997	x		8	1	5	2	0	0	0	0	8
		P1-N0030-A31	2/28/1997	x		14	0	4	8	2	0	0	0	14
		P1-N0034-A31	2/11/1997	x		38	1	4	24	9	0	0	0	38
		P1-N0075-A31	5/27/1999	x		1	0	0	1	0	0	0	0	1
		P1-N0080-A31	5/27/1999	x		6	2	0	3	1	0	0	0	6
		P1-N0081-A31	5/27/1999	x		1	0	0	1	0	0	0	0	1
		P1-N0085-A31	5/27/1999	x		73	1	13	40	19	0	0	0	73
		P1-N0086-A31	5/27/1999	x		1	0	0	0	1	0	0	0	1
P1-N0090-A31	5/27/1999	x		19	0	3	12	4	0	0	0	19		
P1-N0091-A31	5/27/1999	x		1	0	0	1	0	0	0	0	1		

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
		P1-N0095-A31	5/27/1999	x		355	2	75	209	62	7	0	0	355
		P1-N0100-A31	5/27/1999	x		3201	102	973	1714	402	10	0	0	3201
		P1-N0101-A31	5/27/1999	x		4	0	3	1	0	0	0	0	4
		SR-LTCP-31	9/16/1992		x	49	2190	2679	1504	171	5	0	0	6549
		GLTC-3-P-NY-01	3/5/2003		x	7	360	701	733	109	5	0	0	1908
		TOTALS				24	2	7,337	2,732	5,409	6,143	1,413	41	0
Excellus Health Plan, Inc. (previously Blue Cross Blue Shield)	55107	LTC-CD10-NY	4/15/1997	X		1	0	0	1	0	0	0	0	1
		TOTALS				1	0	1	0	0	1	0	0	0
First Unum Life Insurance Company	64297	B.LTC	8/2/1990		X	11464	6695	3045	1557	158	9	642	584	11464
		GLTC04	2/28/2005		X	8745	4074	2646	1723	287	15	723	504	8745
		LTC5092	1/29/1993	X		1	0	0	1	0	0	0	0	1
		LTC5292	1/29/1993	X		4	2	2	0	0	0	0	0	4
		LTC5492	1/29/1993	X		2	0	2	0	0	0	0	0	2
		LTC5592	1/29/1993	X		10	5	0	4	1	0	0	0	10
		LTCP03	10/23/1997	X		521	26	129	278	83	5	15	1	521
		LTCP03F	10/23/1997	X		256	88	92	65	11	0	0	0	256
		LTCT03	10/21/2003	X		85	15	30	25	13	2	0	0	85
		LTCT03F	10/21/2003	X		91	26	32	26	7	0	0	0	91
		NH94	10/22/2003	X		711	42	203	354	111	1	0	0	711
		NH94FQ	10/23/2003	X		2646	508	992	941	192	13	0	0	2646
		NH94Q	12/30/1994	X		13524	748	4097	6839	1744	96	0	1	13524
		NH94Q2	10/23/1997	X		1	0	0	1	0	0	0	0	1
		PHCQ	10/23/1997	X		1	0	0	1	0	0	0	0	1
		RLTCP03	10/21/2003	X		470	11	147	264	45	3	0	0	470
		RLTCP03F	10/21/2003	X		122	16	57	41	7	1	0	0	122
TOTALS				15	2	38,654	12,256	11,474	12,120	2,659	145	1,380	1,090	38,654

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
Genworth Life Insurance Company of New York (previously GE Capital Life Assurance Company of New York)	72990	6667 CRT	4/1/1989		X	24	0	2	18	4	0	0	0	24
		50100	1/1/1996	X		259	0	39	168	52	0	0	0	259
		50107	1/1/1996	X		730	11	123	401	193	2	0	0	730
		50110	1/1/1996	X		265	2	39	143	80	1	0	0	265
		51000	1/1/1996	X		70	2	4	38	23	3	0	0	70
		51002	1/1/1996	X		2141	16	224	1105	768	28	0	0	2141
		51005	11/25/1998	X		7343	94	1175	4087	1880	107	0	0	7343
		51006	12/15/1998	X		198	0	15	86	83	14	0	0	198
		51007	9/28/1998	X		73	0	9	38	22	4	0	0	73
		51010	2/12/2001	X		15577	430	4369	8255	2335	188	0	0	15577
		51012	9/9/2004	X		2645	54	552	1427	561	51	0	0	2645
		51012REV	9/21/2007	X		1877	36	296	1051	466	28	0	0	1877
		51014	9/9/2004	X		4782	160	1336	2720	545	21	0	0	4782
		51014REV	9/21/2007	X		3224	74	864	1841	435	10	0	0	3224
		7048NY	5/25/2007	X		16	0	0	12	4	0	0	0	16
		7052NY	10/6/2011	X		4196	135	1058	2253	724	26	0	0	4196
		8000NY	10/3/2013	X		2607	65	600	1473	462	7	0	0	2607
		7050POL-NY	5/21/2009		X	269	57	80	112	18	2	10	8	269
		51009	7/12/1999		X	3905	1780	920	714	449	42	0	0	3905
		7046POL-NY	12/6/2008		X	762	230	265	220	46	1	0	0	762
7053POL NY	3/13/2012		X	1278	196	470	526	84	2	80	17	1278		
8000R1NY	11/3/2015	X		712	20	161	411	120	0	71	30	712		
		TOTALS		17	5	52,953	3,362	12,601	27,099	9,354	537	161	55	52,953
Globe Life Insurance Company of New York (previously First United American Life Insurance Company)	74101	NYNH2	1/31/1989	X		2			2			0	0	2
		NYNH3	1/31/1989	X		11		2	7	2		0	0	11
		TOTALS		2	0	13	0	2	13	6	0	0	0	13

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
Insurance Company of North America (including Connecticut General and CIGNA)	22713	TL-001445	4/20/1990		X	1	0	14	44	23	0	0	0	81
		TOTALS		0	1	0	14	45	33	0	0	0	0	92
John Hancock Life and Health Insurance Company	96310	BSC-02 NY	4/19/2002	x		135	4	47	0	75	9	0	0	135
		BSC-03 NY	11/14/2003	x		287	5	47	163	63	9	0	0	287
		LTC-02 NY	4/19/2002	x		5794	180	1476	3131	942	65	0	0	5794
		LTC-03 NY	11/14/2003	x		6323	102	1317	3532	1291	81	0	0	6323
		LTC-06 NY	7/10/2006	x		411	22	125	210	53	1	0	0	411
		LTC-11 NY	7/15/2011	x		1264	57	236	695	262	14	0	0	1264
		LTC-87A	7/30/1987	x		21	5	4	10	2	0	0	0	21
		LTC-88A NY	4/15/1988	x		3	0	0	3	0	0	0	0	3
		LTC-88B NY	4/15/1988	x		293	32	55	174	24	8	0	0	293
		LTC-90-NY	9/7/1990	x		88	16	31	36	5	0	0	0	88
		LTC-94 NY	2/24/1994	x		1465	37	370	730	322	6	0	0	1465
		LTC-96 NY 5/01	7/5/2001	x		582	19	87	300	164	12	0	0	582
		LTC-96 NY 9/96	1/16/1997	x		7382	124	1195	3896	2077	90	0	0	7382
		LTC-96CL NY 9/96	1/16/1997	x		3	0	0	3	0	0	0	0	3
		LTC-NY-91	12/31/1991	x		596	24	159	313	96	4	0	0	596
		NH-94 NY	2/24/1994	x		17	1	3	9	3	1	0	0	17
		NH-NY-91	12/31/1991	x		5	0	4	1	0	0	0	0	5
		SG-02 NY	4/19/2002	x		2183	83	509	1216	357	18	0	0	2183
		SG-03 NY	11/14/2003	x		1797	80	444	939	315	19	0	0	1797
		SG-06 NY	7/10/2006	x		256	20	68	134	33	1	0	0	256
		SGB-02 NY	4/19/2002	x		79	3	7	52	14	3	0	0	79
SGB-03 NY	11/14/2003	x		138	1	28	71	32	6	0	0	138		
P-FACE(2009)	10/21/2008		x	8	43	131	131	16	0	0	0	321		
TOTALS		22	1	29,130	858	6,343	15,749	6,146	347	0	0	29,443		

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		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
John Hancock Life Insurance Company (USA)	65838	BSC-03 NY	11/14/2003	x		3	1	0	2	0	0	0	0	3
		LTC-02 NY	4/19/2002	x		54	4	11	26	12	1	0	0	54
		LTC-03 NY	11/14/2003	x		44	2	8	23	11	0	0	0	44
		LTC-06 NY	7/10/2006	x		2	0	1	1	0	0	0	0	2
		LTC-88A NY	4/15/1988	x		1	0	0	1	0	0	0	0	1
		LTC-90-NY	9/7/1990	x		1	1	0	0	0	0	0	0	1
		LTC-94 NY	2/24/1994	x		5	0	2	3	0	0	0	0	5
		LTC-96 NY 5/01	7/5/2001	x		7	1	0	4	2	0	0	0	7
		LTC-96 NY 9/96	1/16/1997	x		47	1	9	29	8	0	0	0	47
		LTC-NY-91	12/31/1991	x		3	0	1	2	0	0	0	0	3
		SG-02 NY	4/19/2002	x		15	1	6	8	0	0	0	0	15
		SG-03 NY	11/14/2003	x		13	0	2	5	4	2	0	0	13
		SG-06 NY	7/10/2006	x		4	0	0	2	2	0	0	0	4
		SGB-02 NY	4/19/2002	x		1	0	0	0	1	0	0	0	1
		GCB-COV-0001	10/19/1989		x	1	125	202	207	50	0	0	0	584
		GDB-CRT-0001.16	12/24/1996		x	1	22	50	16	1	0	0	0	89
		GPB-COV-0002	7/30/1990		x	1	1039	1229	608	55	1	0	0	2932
		GPB-COV-0002.01	6/28/1996		x	28	1198	1207	869	160	2	0	0	3436
		P-FACE(2002-2)	10/17/2002		x	48	927	1336	1222	209	3	0	0	3697
		P-FACE(2004)	2/15/2006		x	18	256	272	199	14	0	0	0	741
TOTALS				14	6	297	3,578	4,336	3,227	529	9	0	0	11,679
Knights of Columbus	58033	LTC01-NY 6-99	10/18/2000	X		942	71	262	466	139	4	0	0	942
		NHC01-NY 6-99	10/18/2000	X		192	10	51	100	30	1	0	0	192
		LTC2 NY 7-14	1/6/2016	X		102	9	38	39	16	0	26	19	102
		NHC2 NY 7-14	1/6/2016	X		25	2	10	8	5	0	4	2	25
		TOTALS				4	0	1,261	92	361	613	190	5	30

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	NAIC #	Form Number	Date of NYS DFS Approval	Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
				I	G		Under 45	45-54	55-64	65-74	75 and Over			
Massachusetts Mutual Life Insurance Company	65935	MM-200-P-NY	7/28/2002	x		330	9	135	266	57	2	0	0	469
		MM-201-P-NY	7/28/2002	x		3	0	2	2	0	0	0	0	4
		MM-202-P-NY	7/28/2002	x		1	0	0	0	1	0	0	0	1
		MM-203-P-NY	7/28/2002	x		112	21	74	74	12	0	0	0	181
		MM-204-P-NY	7/28/2002	x		1	0	0	1	0	0	0	0	1
		MM-300-P-NY	3/13/2003	x		578	64	312	423	60	3	0	0	862
		MM-301-P-NY	3/13/2003	x		5	0	1	3	0	1	0	0	5
		MM-303-P-NY	3/13/2003	x		300	87	209	164	19	1	0	0	480
		MM-304-P-NY	3/13/2003	x		1	1	0	0	0	0	0	0	1
		MM-400-P-NY	4/8/2005	x		367	24	179	303	46	1	0	0	553
		MM-401-P-NY	4/8/2005	x		2	1	1	2	0	0	0	0	4
		MM-402-P-NY	4/8/2005	x		204	42	133	152	14	0	0	0	341
		MM-403-P-NY	4/8/2005	x		1	0	0	1	0	0	0	0	1
		MM-500-P-NY	3/19/2008	x		1197	59	322	650	156	10	0	0	1197
		MM-501-P-NY	3/19/2008	x		12	1	2	8	1	0	0	0	12
		MM-502-P-NY	3/19/2008	x		354	57	131	140	26	0	0	0	354
		MM-503-P-NY	3/19/2008	x		4	3	0	1	0	0	0	0	4
		MM-504-P-NY	3/19/2008	x		12	4	4	4	0	0	0	0	12
		MM-505-P-NY	3/19/2008	x		0	0	0	0	0	0	0	0	0
		MM-500-P-1-NY	1/30/2012	x		256	11	74	130	41	0	0	0	256
		MM-501-P-1-NY	1/30/2012	x		3	0	0	2	1	0	0	0	3
		MM-502-P-1-NY	1/30/2012	x		65	10	23	31	1	0	0	0	65
		MM-503-P-1-NY	1/30/2012	x		1	0	0	1	0	0	0	0	1
		MM-504-P-1-NY	1/30/2012	x		2	1	1	0	0	0	0	0	2
		MM-505-P-1-NY	1/30/2012	x		0	0	0	0	0	0	0	0	0
		MM-500-P-2-NY	10/22/2012	x		1669	62	479	847	278	3	269	185	1669
		MM-501-P-2-NY	10/22/2012	x		10	0	1	9	0	0	0	3	10
		MM-502-P-2-NY	10/22/2012	x		236	18	81	115	21	1	18	0	236
MM-503-P-2-NY	10/22/2012	x		1	0	0	1	0	0	0	0	1		
MM-504-P-2-NY	10/22/2012	x		6	0	4	2	0	0	0	0	6		
MM-505-P-2-NY	10/22/2012	x		1	0	1	0	0	0	0	0	1		
TOTALS				31	0	5,734	475	2,169	3,332	734	22	287	188	6,732

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		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
MedAmerica Insurance Company of New York	83437	FC-336-NY-et al	5/1/2012	X		504	63	131	225	79	6	0	0	504
		HTQ11-338-NY-998	3/23/2000	X		313	1	22	132	132	26	0	0	313
		LT-1-3	10/1/1987	X		1	0	0	1	0	0	0	0	1
		LTC89-CD1	4/18/1987	X		8	0	0	8	0	0	0	0	8
		LTC89-CD2	1/1/1989	X		41	12	11	15	3	0	0	0	41
		LTC89-CD3	4/18/1989	X		3	0	0	2	1	0	0	0	3
		TC91-CD4-NY (10/91)	7/1/1991	X		625	13	81	381	148	2	0	0	625
		LTC-CD10-NY	4/15/1997	X		736	34	142	358	192	10	0	0	736
		LTC-CD6-NY	3/30/1993	X		32	0	3	23	6	0	0	0	32
		LTC-CD6TQ-NY	6/24/1997	X		79	0	8	52	19	0	0	0	79
		LTC-CD8-NY	7/31/1995	X		113	2	14	64	32	1	0	0	113
		LTC-CD8TQ-NY	1/29/1997	X		59	3	7	39	10	0	0	0	59
		LTC-LBP10-NY	4/15/1997	X		50	1	1	11	33	4	0	0	50
		LTC-LBP8-NY	7/31/1995	X		75	0	4	37	34	0	0	0	75
		LTC-LBP8TQ-NY	1/29/1997	X		19	0	1	10	8	0	0	0	19
		LTC-LBP-NY	9/23/1994	X		207	4	34	103	65	1	0	0	207
		LTQ11-336-NY-998	3/22/2000	X		862	72	223	401	150	16	0	0	862
		NTQ11-337-NY-998	3/23/2000	X		31	0	1	9	14	7	0	0	31
		PRT11-336-NY-998	2/20/2001	X		250	18	48	118	60	6	0	0	250
		SPL2-336-NY-et al	3/14/2007	X		2314	309	743	966	278	18	0	0	2314
		SPL-336-NY-et al	2/24/2002	X		2582	365	885	1077	248	7	0	0	2582
		TRL-336-NY	11/2/2012	X		15	0	1	8	5	1	0	0	15
		CG-336-NY-et al	7/9/2015	X		9	1	7	1	0	0	0	0	9
		PRT11-336-NY-305	9/1/2006	X		162	5	59	77	21	0	0	0	162
		LTC89-CD1	4/18/1987		X	17	0	1	15	1	0	0	0	17
		LTC89-CD2	1/1/1989		X	293	96	105	81	11	0	0	0	293
		LTC89-CD3	4/18/1989		X	1	0	0	1	0	0	0	0	1
GRP11342NY999	3/24/2000		X	815	290	325	182	17	1	0	0	815		
GRPSPL-342-NY	6/23/2005		X	182	65	71	43	3	0	0	0	182		
PGR11-342-NY-900	3/13/2001		X	1	1	0	0	0	0	0	0	1		
NYG11-342-NY-0612	11/28/2012		X	148	29	47	57	15	0	0	0	148		
NYG11-342-NY-200	6/1/2001		X	2886	517	1197	1010	156	6	0	0	2886		

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		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
		NYP11-342-NY-200	6/1/2001		X	100	10	40	44	5	1	0	0	100
		TOTALS		24	9	13,533	1,911	4,212	5,551	1,746	113	0	0	13,533
Metropolitan Life Insurance Company	65978	G.24113	6/27/1991		X	1	21	12	1	0	0	0	0	34
		G.24194	4/18/1995		X	1	12	7	1	0	0	0	0	20
		G.LTC1597	7/10/1997		X	2	3	1	2	0	0	0	0	6
		G.LTC1697	5/29/1998		X	6	6	1,190	3,107	1,501	73	0	0	5,877
		G.LTC197	11/8/2002		X	9	7,835	6,806	5,894	1,214	53	0	0	21,802
		G.LTC2095	6/28/1996		X	1	271	329	196	67	4	0	0	867
		GPNP99-LTC	1/1/2001		X	23	5,064	6,921	5,666	1,513	219	0	0	19,383
		LTC.2500	1/1/1996		X	1	264	429	286	50	2	0	0	1,031
		1LTC-97-NY (00)	5/25/1999	X		1,678	85	576	769	232	16	0	0	1,678
		2LTC-97-NY (00)	5/25/1999	X		26	0	5	10	11	0	0	0	26
		LTC.02	12/23/1991	X		400	12	52	197	131	8	0	0	400
		LTC.03(NY)	3/31/1999	X		838	7	94	452	269	16	0	0	838
		LTC2007-NY	3/3/2009	X		498	43	161	225	65	4	0	0	498
		LTC2-FAC-NY	8/9/2002	X		21	2	6	3	9	1	0	0	21
		LTC2-IDEAL-NY	11/25/2002	X		1,810	112	483	970	222	23	0	3	1,810
		LTC2-PREM-NY	8/28/2002	X		334	36	125	146	25	2	0	0	334
		LTC2-VAL-NY	8/9/2002	X		2,475	183	668	1,247	343	34	0	0	2,475
		LTC-FAC-NY	7/20/2005	X		38	4	7	25	1	1	0	0	38
		LTC-IDEAL-NY	7/20/2005	X		2,860	186	979	1,460	227	8	0	0	2,860
		LTC-PREM-NY	7/20/2005	X		249	46	100	91	11	1	0	0	249
LTC-VAL-NY	7/20/2005	X		1,865	122	574	933	222	14	0	1	1,865		
TCL-LTC.04 (NY)	3/21/2000	X		1,017	24	175	560	248	10	0	0	1,017		
		TOTALS		14	8	14,153	14,338	19,700	22,241	6,361	489	0	4	63,129

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				I	G									
Mutual of Omaha	71412	LTC04	1/27/2005	X		438	9	95	252	75	7	0	0	438
		HCA	6/22/2000	X		15	1	4	4	4	2	0	0	15
		HCAQ	6/22/2000	X		36	1	6	15	13	1	0	0	36
		LT50	5/12/1998	X		125	11	31	57	25	1	0	0	125
		LTA	6/22/2000	X		12	0	4	7	1	0	0	0	12
		LTAQ	6/22/2000	X		133	8	40	69	15	1	0	0	133
		LTC12	4/28/1993	X		35	1	5	18	11	0	0	0	35
		LTC17	4/28/1993	X		23	4	6	8	5	0	0	0	23
		LTI12	4/28/1993	X		0	0	0	0	0	0	0	0	0
		LTM12	4/28/1993	X		3	0	0	2	1	0	0	0	3
		NH11	1/28/1988	X		4	0	2	2	0	0	0	0	4
		NH27	2/3/1989	X		15	6	4	4	1	0	0	0	15
		NH28	2/3/1989	X		2	1	0	0	1	0	0	0	2
		NH3	12/10/1984	X		1	0	0	0	0	1	0	0	1
		NH50	4/17/1998	X		7	0	1	5	1	0	0	0	7
		NHA	6/22/2000	X		30	0	7	17	5	1	0	0	30
		NHAQ	6/22/2000	X		190	6	64	95	24	1	0	0	190
		LTC09	2/1/2010	X		3,991	102	681	2,362	797	49	0	0	3,991
		LTC13	7/8/2015	X		4,754	134	872	2,578	1,139	31	1,070	954	4,754
LTC17	11/29/2018	X		25	1	4	7			6	7	25		
TOTALS				20	0	9,839	285	1,826	5,502	2,118	95	1,076	961	9,839
New York Life Insurance Company	66915	21084(NY)	5/15/1995	X		3	0	0	2	1	0	0	0	3
		21073(NY)	5/15/1995	X		27	0	0	19	8	0	0	0	27
		G-9065	12/16/1998		X	1	4	10	11	4	0	0	0	29
		ILTC-4300(NY)(0197)	2/11/1998	X		2,715	435	1,069	903	296	12	0	0	2,715
		INH-4300(NY)(0197)	2/11/1998	X		15	1	3	7	3	1	0	0	15
		INH-5000(NY)(1001)	12/20/2002	X		53	5	21	21	6	0	0	0	53
		ILTC-5000(NY)(1001)	12/20/2002	X		5,781	901	1,999	2,247	603	31	0	0	5,781
		FNH-5000(NY)(0503)	5/18/2004	X		6	1	1	2	2	0	0	0	6
		FLTC-5000(NY)(0503)	5/18/2004	X		1,314	345	450	428	83	8	0	0	1,314
		LTC6 (NY)	1/7/2016	X		1,691	161	429	791	305	5	466	442	1,691
		FLTC6-U (NY)	9/23/2016	X		43	14	8	17	4	0	7	19	43
TOTALS				10	1	11,649	1,867	3,990	4,448	1,315	57	473	461	11,677

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
Northwestern Long Term Care Insurance Company	69000	RS.LTC.(0708)	6/16/2008	X		2,626	261	979	1,124	250	12	0	0	2,626
		RS.LTC.ML.(0708)	6/16/2008	X		406	111	117	145	31	2	0	0	406
		RS.LTC.(1101)	10/29/2001	X		1,236	150	432	520	128	6	0	0	1,236
		RS.LTC.ML.(1101)	8/22/2002	X		190	65	43	64	17	1	0	0	190
		TT.LTC.(1010)	6/16/2010	X		5,459	891	1,985	2,108	452	23	0	0	5,459
		TT.LTC.ML.(1010)	6/16/2010	X		766	307	245	181	33	0	0	0	766
		UU.LTC.(1014)	7/8/2015	X		2,630	254	747	1,275	339	15	445	293	2,630
		UU.LTC.ML.(1014)	7/8/2015	X		180	59	39	70	12	0	32	19	180
		UU.LTC.ML.SN.(1014)	7/8/2015	X		9	4	2	3	0	0	0	2	9
		TOTALS				9	0	13,502	2,102	4,589	5,490	1,262	59	477
Principal Life Insurance Company	61271	FR 601	1/1/1992		X	39	18	12	8	1	0	0	0	39
		TOTALS				0	1	44	18	13	12	1	0	0
Provident Life and Casualty Insurance Company	68209	2600	N/A		X	1	16	44	25	9	1	0	0	95
		TOTALS				0	1	1	16	44	25	9	1	0
Prudential Insurance Company of America	68241	83500 LTCR 8002, et al (AICPA GLTC-1)	6/30/1993		X	1	1259	395	135	18	2	0	0	1809
		83500 LTCR 200, LTC U 2001	10/4/1995											0
		83500 COV 1004	7/6/1999											0
		83500 COV 1004	12/1/2000											0
		83500 BFW 5005, et al (GLTC-3/3.5)	5/29/2002		X	50	3340	4429	3488	549	24	6	0	11830
		83500 COV 5022, et al (GLTC-4)	10/28/2008		X	18	901	1601	1320	182	7	0	0	4011
		GRP 99210 (ILTC-1 SIMPLE)	6/10/1999	X		506	32	113	239	118	4	0	0	506
		GRP 99211 (ILTC-1 COMPOUND)	6/10/1999	X		1125	157	474	428	66	0	0	0	1125
		GRP 112552 (ILTC-2)	9/3/2003	X		1293	82	427	576	196	12	0	0	1293
		GRP 112622 (ILTC-2 Franchise)	9/3/2003	X		294	24	70	149	50	1	0	0	294
GRP 113141 (ILTC-3)	10/18/2006	X		1849	97	515	889	327	21	0	0	1849		

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
		GRP 113772 (ILTC-3 Franchise)	8/16/2007	X		1717	173	430	859	239	16	0	0	1717
		GRP 114201 (Evolution ILTC4)	10/2/2009	X		25	5	9	8	3	0	0	0	25
		TOTALS		7	3	6,878	6,070	8,463	8,091	1,748	87	6	0	24,459
River Source Life Insurance Co. of NY	80594	38240	10/20/1989	X		159	0	26	116	15	2	0	0	159
		38240C	12/31/1991	X		234	0	30	171	33	0	0	0	234
		38225	8/31/1994	X		2393	63	791	1283	251	5	0	0	2393
		38260A	11/10/1999	X		1936	52	653	956	271	4	0	0	1936
		TOTALS		4	0	4,722	115	1,500	2,526	570	11	0	0	4,722
State Farm Mutual Automobile Insurance Company	25178	97045NY.1	1/1/1998	X		505	105	159	188	50	3	0	0	505
		97045NY.2	5/8/2001	X		80	17	27	30	6	0	0	0	80
		97058NY	12/31/2001	X		436	116	114	169	35	2	0	0	436
		97059NY	9/21/2005	X		514	87	152	220	53	2	0	0	514
		TOTALS		4	0	1,535	325	452	607	144	7	0	0	1,535
Talcott Resolution Life Insurance Company (previously Hartford Life Insurance Company)	88072	SRP1353	1/28/1999		X	6	0	5	1	0	0	0	0	6
		SRP1366	7/1/1999	X		2	0	0	0	0	2	0	0	2
		TOTALS		1	1	8	0	5	1	0	2	0	0	8
Teachers Insurance and Annuity Association of America	69345	LTC.2500	1/1/1996		X	1	37	78	78	11	1	0	0	205
		LTC.02	12/23/1991	X		165	3	20	91	50	1	0	0	165
		LTC.03(NY)	3/31/1999	X		379	7	48	178	143	3	0	0	379
		TOTALS		2	1	545	47	146	347	204	5	0	0	749
Thrivent Financial for Lutherans (previously Aid Association for Lutherans)	56014	12105 NY	12/28/1998	X		199	5	68	87	39	0	0	0	199
		12106 NY	12/28/1998	X		29	1	2	19	7	0	0	0	29
		TOTALS		2	0	228	6	70	106	46	0	0	0	228

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
TIAA-Cref Life Insurance Company	60142	TCL-LTC.04 (NY)	3/21/2000	X		419	13	63	227	112	4	0	0	419
		TOTALS		1	0	419	13	63	227	112	4	0	0	419
Transamerica Financial Life Insurance Company (including AUSA)	70688	GCPLUS 2 1290 (NY)	6/28/1996	x		1	0	1	0	0	0	0	0	1
		LTC 304-198-NY	3/30/2001	x		49	2	11	30	5	1	0	0	49
		NLTCP TQ LTC FR (NY) 297	7/27/2000	x		21	0	5	12	4	0	0	0	21
		P-0001 (NY) 4/98	3/30/2001	x		37	0	7	26	2	2	0	0	37
		TFL 1-FP (NY) 402	5/20/2004	x		227	19	53	115	38	2	0	0	227
		TFL 2-P NY 0410	11/7/2011	x		1592	139	376	838	229	10	51	26	1592
		TFL 2-P NYF 0410	11/7/2011	x		1517	319	402	640	153	3	111	95	1517
TOTALS		7	0	344400%	479	855	1,661	431	18	162	121	3,444		
Union Security Life Insurance Company (previously First Fortis)	81477	4062 - NY	10/8/1998	x		120	1	20	59	33	7	0	0	120
		4063 - NY	10/8/1998	x		2219	17	416	1337	438	11	0	0	2,219
		TOTALS		2	0	2,339	18	436	1,396	471	18	0	0	2,339
The United States Life Insurance Company In The City Of New York (American International Life Assurance Company of New York)	70106	64391-NY	12/17/1997	X		116	5	27	83	26	3	0	0	144
		64391-NYTQ	12/17/1997	X		127	0	15	106	31	2	0	0	154
		TOTALS		2	0	243	5	42	189	57	5	0	0	298
VOYA Retirement Insurance and Annuity Company	86509	24420 (NCF)	10/19/1987	X		24	0	7	17	0	0	0	0	24
		24236 (NHP)	5/2/1986	X		5	0		3	1	1	0	0	5
		TOTALS		2	0	29	0	7	20	1	1	0	0	29

All data provided has been self-reported by the insurers and has not been verified by DFS

Appendix III

Number of Partnership LTC Policies In-Force in New York as of December 31, 2020

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
American Family Life Assurance of New York*	60526	NY-23000	12/2/1994	X		1	1	0	0	0	0	0	0	1
		TOTALS		1	0	1	1	0	0	0	0	0	0	1
American Progressive Life and Health Insurance Company of NY*	80624	APRLTCP (11/99) NY	11/1/1999	X		49		7	18	23	1	0	0	49
		TOTALS		1	0	49	0	7	18	23	1	0	0	60
Athene Insurance Company of New York (including Aviva Life & Annuity Company of New York)*	63932	N-2500-P	2/18/1994	x		188	8	52	100	28	0	0	0	188
		N-2500-P(Q)	2/18/1994	x		54	4	17	26	7	0	0	0	54
		TOTALS		2	0	242	12	69	126	35	0	0	0	0
Bankers Consec Life Insurance Company (previously Consec)*	68560	ATIC-RWJ-NY	10/7/1996	X		522	4	66	417	170	2			659
		TOTALS		1	0	522	4	66	417	170	2	0	0	659
Brighthouse Life Insurance Company (previously Travelers and MetLife USA)*	87726	LC3	3/1/1997	X		2238	14	264	1261	688	11	0	0	2238
		LC4	3/9/1997	X		1418	12	234	849	315	8	0	0	1,418
		TOTALS		2	0	3,656	28	498	2,110	1,003	19	0	0	3,656

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
Continental Casualty Company (CNA)*	20443	P1-18584-A31	3/23/1993	X	P/C	880	12	148	466	250	4	0	0	880
		P1-18585-A31	3/23/1993	X	P/C	40	0	10	21	9	0	0	0	40
		P1-N0041-A31	7/29/1997	X	TQ	2817	58	526	1546	662	25	0	0	2817
		P1-N0042-A31	7/29/1997	X	TQ	17	0	0	12	5	0	0	0	17
		SR-LTCP-31	1/1/1994		X	4	81	202	123	24	1	0	0	431
		TOTALS		4	1	3,758	151	886	2,168	950	30	0	0	4,185
Genworth Life Insurance Company of New York (previously GE Capital Life Assurance Co. of NY)	72990	50109	1/1/1996	X		252	1	26	132	91	2	0	0	252
		51001	1/30/1996	X		782	1	82	414	274	11	0	0	782
		51011	8/31/2001	X		5802	137	1592	3369	681	23	0	0	5802
		51013	9/9/2004	X		3585	81	972	2164	360	8	0	0	3585
		51015	12/15/2005	X		1158	19	223	744	168	4	0	0	1158
		51015REV	9/26/2007	X		7331	99	1270	4605	1328	29	0	0	7331
		7052NYP	10/5/2011	X		2776	57	589	1698	423	9	0	0	2776
		8000NYP	10/3/2013	X		2698	45	425	1544	672	12	0	0	2698
		8000R1NYP	11/3/2015	X		176	1	32	111	31	1	9	2	176
TOTALS		9	0	24,560	441	5,211	14,781	4,028	99	74	36	24,560		
John Hancock Life & Health Insurance Company	96310	LTC-11 NYP	8/18/2011	x		65	2	13	29	20	1	0	0	65
		LTC-96RWJ2 NY 4/99	7/5/2001	x		511	3	62	304	133	9	0	0	511
		LTC-96RWJ2 NY 9/97	3/20/1998	x		7493	52	1039	4388	1889	125	0	0	7,493
		LTC-NY-91-RWJ, LTC-NY-91-RWJ 3/95	3/25/1993	x		697	7	75	378	236	1	0	0	697
		NYP-05	2/9/2006	x		6452	96	1174	4168	975	39	0	0	6,452
		TOTALS		5	0	15,218	160	2,363	9,267	3,253	175	0	0	15,218
John Hancock Life Insurance Company (U.S.A.)	65838	LTC-96RWJ2 NY 4/99	7/5/2001	x		4	0	0	2	2	0	0	4	
		LTC-96RWJ2 NY 9/97	3/20/1998	x		46	1	6	31	6	2	0	46	
		LTC-NY-91-RWJ, LTC-NY-91-RWJ 3/95	3/25/1993	x		6	0	1	4	1	0	0	6	
		NYP-05	2/9/2006	x		25	0	6	16	3	0	0	25	
		TOTALS		4	0	81	1	13	53	12	2	0	0	81

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
Massachusetts Mutual Life Insurance Company	65935	MM-202-P-NYP	7/28/2002	x		35	1	16	25	9	1	0	0	52
		MM-205-P-NYP	7/28/2002	x		4	0	2	3	2	0	0	0	7
		MM-302-P-NYP	3/13/2003	x		5	0	1	6	0	0	0	0	7
		MM-305-P-NYP	3/13/2003	x		0	0	0	0	0	0	0	0	0
		MM-506-P-NYP	1/21/2009	x		121	3	25	75	17	1	0	0	121
		MM-507-P-NYP	1/21/2009	x		3	0	0	2	1	0	0	0	3
		MM-508-P-NYP	1/21/2009	x		35	1	8	26	0	0	0	0	35
		MM-510-P-NYP	1/21/2009	x		3	0	3	0	0	0	0	0	3
		MM-506-P-1-NYP	2/3/2012	x		4	0	2	2	0	0	0	0	4
		MM-507-P-1-NYP	2/3/2012	x		0	0	0	0	0	0	0	0	0
		MM-508-P-1-NYP	2/3/2012	x		5	0	2	3	0	0	0	0	5
		MM-510-P-1-NYP	2/3/2012	x		0	0	0	0	0	0	0	0	0
		MM-506-P-2-NYP	11/30/2012	x		93	2	31	45	15	0	9	4	93
		MM-507-P-2-NYP	11/30/2012	x		4	0	0	2	2	0	1	1	4
		MM-508-P-2-NYP	11/30/2012	x		5	0	0	3	2	0	0	0	5
		MM-510-P-2-NYP	11/30/2012	x		2	0	2	0	0	0	0	0	2
TOTALS				16	0	319	7	92	192	48	2	10	5	341
MedAmerica Insurance Company of New York*	83437	LTC-CD6-NY	3/30/1993	X		375	9	34	211	120	1	0	0	375
		LTC-CD6TQ-NY	6/24/1997	X		765	6	98	434	224	3	0	0	765
		PRT11-336-NY-0612	2/6/2013	X		1112	50	209	630	211	12	0	0	1112
		PRT11-336-NY-305	9/1/2006	X		1396	56	347	671	294	28	0	0	1396
		PRT11-336-NY-998	2/20/2001	X		1980	67	393	1031	450	39	0	0	1980
		NYP11-342-NY-0612	11/28/2012		X	73	10	23	31	9	0	0	0	73
		NYP11-342-NY-200	6/1/2001		X	1009	118	382	397	106	6	0	0	1009
		PGR11-342-NY-900	3/13/2001		X	11	0	4	7	0	0	0	0	11
TOTALS				5	3	6,721	316	1,490	3,412	1,414	89	0	0	6,721
Metropolitan Life Insurance Company*	65978	G.LTC197-NYP	11/8/2002		X	1	28	106	271	67	3	0	0	475
		1LTC-97 NYP	8/31/2001	X		108	4	21	61	20	2	0	0	108
		LTC2-DD100-NYP	10/31/2005	X		28	0	1	20	6	1	0	0	28
		LTC2-DD50-NYP	10/31/2005	X		43	3	7	19	14	0	0	0	43

Insurer	NAIC #	Policy		Type of Coverage (Individual or Group)		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
		Form Number	Date of NYS DFS Approval				Under 45	45-54	55-64	65-74	75 and Over			
				I	G									
		LTC2-TD100-NYP	10/31/2005	X		1034	49	291	601	91	2	0	0	1,034
		LTC2-TD50-NYP	10/31/2005	X		1682	41	361	1024	229	27	0	0	1,682
		LTC-VAL-NYP	12/16/2002	X		1948	65	524	1109	245	5	0	0	1,948
		RWJ.01	2/25/1994	X		74	1	4	38	29	2	0	0	74
		TOTALS		7	1	4,918	191	1,315	3,143	701	42	0	0	5,392
Mutual of Omaha Insurance Company*	71412	LTC20	10/26/1993	X		32	3	10	12	7				32
		LTC23	10/26/1993	X		0								0
		LTM20	10/26/1993	X		4		2	2					4
		TOTALS		3	0	36	3	12	14	7	0	0	0	36
New York Life Insurance Company*	66915	21050RWJ	5/15/1995	X		26	1	8	16	1	0	0	0	26
		21050 50TAP (0105)	3/20/2006	X		86	4	26	36	19	1	0	0	86
		21050 100TAP (0105)	3/20/2006	X		52	11	24	14	3	0	0	0	52
		21050 50DDAP (0105)	3/20/2006	X		6	0	1	2	2	1	0	0	6
		TOTALS		4	0	170	16	59	68	25	2	0	0	170
Prudential Insurance Company of America*	68241	83500 PLTC 9001	11/14/1995		X	1	1	2	1	0	0	0	0	4
		GRP 99865	11/27/2001	X		94	1	20	55	15	3	0	0	94
		TOTALS		1	1	102	2	22	60	19	4	0	0	98
Teachers Insurance and Annuity Association of America	69345	RWJ.01	2/25/1994	X		25	0	3	11	11	0	0	0	25
		TOTALS		1	0	25	0	3	11	11	0	0	0	25
Transamerica Financial Life Insurance Company*	70688	LTC 304-198-NYP	3/11/2002	x		20		7	8	4	1			20
		TOTALS		1	0	20	0	7	8	4	1	0	0	20
Union Security Life Insurance Company (previously First Fortis)*	81477	4051 - NY	9/24/1998	x		1341	13	168	801	344	15	0	0	1341
		TOTALS		1	0	1341	13	168	801	344	15	0	0	1341

All data provided has been self-reported by the insurers and has not been verified by DFS.

APPENDIX IV

Number of Partnership AND Non-Partnership LTC Policies In-Force in New York as of December 31, 2020

	Type of Coverage		Number of Existing Policies	Number of Insured Persons Issued Coverage (by Age Group at Time of Purchase)					Number of Insured Persons Issued Coverage from 1/1/19 through 12/31/19	Number of Insured Persons Issued Coverage from 1/1/20 through 12/31/20	Total Number of Insured Persons
	Individual	Group		Under 45	45-54	55-64	65-74	75 and Over			
NON-PARTNERSHIP TOTALS	308	44	239,087	53,071	94,616	137,999	43,750	2,548	4,474	3,253	331,428
PARTNERSHIP TOTALS	68	6	61,739	1,346	12,281	36,649	12,047	483	84	41	62,806
PARTNERSHIP AND NON-PARTNERSHIP TOTALS	376	50	300,826	54,417	106,897	174,648	55,797	3,031	4,558	3,294	394,234

All data provided has been self-reported by the insurers and has not been verified by DFS.