



June 25, 2018

Superintendent Elizabeth Dwyer
Department of Business Regulation
Insurance Division
1511 Pontiac Ave, Bldg 68-2
Cranston, RI 02920

DELIVERY VIA Email

Re: Comments on Proposed Amendments to Rhode Island Long-Term Care Insurance Regulation

Dear Superintendent Dwyer:

On behalf of the American Council of Life Insurers (ACLI¹) and America's Health Insurance Plans (AHIP²), we commend the Rhode Island Department of Business Regulation (Department) for proposing amendments to Long-Term Care Insurance Regulation to adopt the *NAIC Long-Term Care Insurance Model Regulation* (NAIC Model).

We strongly support Rhode Island adopting the current NAIC Model provisions. We have one suggested change. We recommend that the Department make the amendments to the regulation effective six months after the regulation is adopted to ensure carriers sufficient time to comply with the new regulation.

We appreciate the opportunity to provide comments and look forward to working with the Department on the implementation of the regulation.

Sincerely,

ACLI

Chuck Piacentini

AHIP

Amanda Matthiesen

¹ The American Council of Life Insurers (ACLI) advocates on behalf of approximately 290 member companies dedicated to providing products and services that contribute to consumers' financial and retirement security. ACLI members represent 95 percent of industry assets, 93 percent of life insurance premiums, and 98 percent of annuity considerations in the United States. 75 million families depend on our members' life insurance, annuities, retirement plans, long-term care insurance, disability income insurance and reinsurance products. Taking into account additional products including dental, vision and other supplemental benefits, ACLI members provide financial protection to 90 million American families. Learn more at www.acli.com.

² America's Health Insurance Plans (AHIP) is the national association whose members provide coverage for health care and related services. Through these offerings, we improve and protect the health and financial security of consumers, families, businesses, communities and the nation. We are committed to market-based solutions and public-private partnerships that improve affordability, value, access and well-being for consumers.

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