

SERFF Tracking Number: UNAM-125992985 *State:* Arkansas
Filing Company: Constitution Life Insurance Company *State Tracking Number:* 41365
Company Tracking Number: NW PRE 2009 AR
TOI: MS021 Individual Medicare Supplement - Pre-Standardized *Sub-TOI:* MS021.000 Medicare Supplement - Pre-Standardized
Product Name: Pre-Standardized Medicare Supplement
Project Name/Number: NW PRE 2009 AR/1522, et al

Filing at a Glance

Company: Constitution Life Insurance Company

Product Name: Pre-Standardized Medicare Supplement SERFF Tr Num: UNAM-125992985 State: ArkansasLH

TOI: MS021 Individual Medicare Supplement - Pre-Standardized SERFF Status: Closed State Tr Num: 41365

Sub-TOI: MS021.000 Medicare Supplement - Pre-Standardized Co Tr Num: NW PRE 2009 AR State Status: FEES PAID

Filing Type: Rate Co Status: Reviewer(s): Stephanie Fowler
 Authors: Carmen Boyd, Trudi Goldenberg Disposition Date: 01/22/2009
 Date Submitted: 01/16/2009 Disposition Status: Approved

Implementation Date Requested: 04/01/2009 Implementation Date: 04/01/2009

State Filing Description:

General Information

Project Name: NW PRE 2009 AR

Project Number: 1522, et al

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact: 10%

Filing Status Changed: 01/22/2009

State Status Changed: 01/20/2009

Corresponding Filing Tracking Number: NW PRE 2009 AR

Filing Description:

Filing on Behalf of:

Nationwide Life Insurance Company

NAIC # 66869

Request for Rate Revision – Individual Pre-Standardized Medicare Supplement

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Group Market Size:

Group Market Type:

Deemer Date:

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 Forms: 1522, et al

Constitution Life Insurance Company is submitting this filing on behalf of Nationwide Life Insurance Company. Nationwide Life Insurance Company is requesting a 10% rate increase on all Pre-Standard Medicare Supplement plans. This is a closed block of business.

Company and Contact

Filing Contact Information

Trudi Goldenberg, tgoldenberg@uafc.com
 P.O. Box 958465 (407) 628-1776 [Phone]
 Lake Mary, FL 32795-8465

Filing Company Information

Constitution Life Insurance Company CoCode: 62359 State of Domicile: Texas
 1001 Heathrow Park Lane Group Code: 953 Company Type:
 Suite 5001
 Lake Mary, FL 32746 Group Name: State ID Number:
 (407) 995-8000 ext. [Phone] FEIN Number: 36-1824600

Filing Fees

Fee Required? Yes
 Fee Amount: \$50.00
 Retaliatory? No
 Fee Explanation: Closed block, rate filing fee.
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Constitution Life Insurance Company	\$50.00	01/16/2009	25081730

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Stephanie Fowler	01/22/2009	01/22/2009

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Disposition

Disposition Date: 01/22/2009

Implementation Date: 04/01/2009

Status: Approved

Comment: We have approved the requested 10.0% rate increase to be implemented on or after April 1, 2009. This approval is subject to the following:

Increases will not be given more frequently than once in a twelve-month period.

Company Name:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Premium:	Maximum % Change (where required):	Minimum % Change (where required):	Overall % Indicated Change:
Constitution Life Insurance Company	10.000%	\$1,225	4	\$12,253	10.000%	10.000%	10.000%

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Item Type	Item Name	Item Status	Public Access
Supporting Document	Health - Actuarial Justification	Approved	Yes
Supporting Document	Authorization to File	Accepted for Informational Purposes	Yes
Rate	Rates and Rate History	Approved	Yes

SERFF Tracking Number: UNAM-125992985 State: Arkansas
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 Product Name: Pre-Standardized Medicare Supplement
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Rate Information

Rate data applies to filing.

Filing Method: SERFF
Rate Change Type: Increase
Overall Percentage of Last Rate Revision: 10.000%
Effective Date of Last Rate Revision: 04/01/2008
Filing Method of Last Filing: SERFF

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Premium:	Maximum % Change (where required):	Minimum % Change (where required):
Constitution Life Insurance Company	10.000%	10.000%	\$1,225	4	\$12,253	10.000%	10.000%

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Rate/Rule Schedule

Review Status:	Document Name:	Affected Form Numbers: (Separated with commas)	Rate Action:	Rate Action Information:	Attachments
Approved	Rates and Rate History 1522, et al		New		AR Pre-Std Rates & History.pdf

Nationwide Life Insurance Company
Actuarial Justification for A&H Rate Increase
Individual Pre-Standardized Medicare Supplement Plans
Exhibit A - Current and Requested Premium Rates

<u>Form</u>	<u>Age at Issue</u>	<u>Current Rate</u>	<u>Requested Rate</u>
1522	65-80+	2,954	3,250

	Factor
Semi-Annual	0.510
Quarterly	0.265
Monthly	0.087

Nationwide Life Insurance Company

Actuarial Justification for A&H Rate Increase
Individual Medicare Supplement Pre-Standardized Plans

Exhibit B - Rate Increase History

<u>Arkansas</u>		
<u>Form</u>	<u>Increase</u>	<u>Approved</u>
1522	7.7%	1/1/1983
	8.5%	1/1/1984
	6.4%	1/1/1985
	13.0%	1/1/1986
	0.0%	3/16/1994
	10.0%	9/1/1995
	15.0%	10/10/1996
	30.0%	4/22/1998
	20.0%	5/11/1999
	20.0%	8/22/2000
	10.0%	8/14/2001
	12.0%	8/26/2002
	14.0%	12/17/2004
	12.9%	02/01/05
	12.0%	12/08/05
	15.0%	01/17/07
	10.0%	1/10/2008

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Supporting Document Schedules

Satisfied -Name: Health - Actuarial Justification **Review Status:** Approved 01/22/2009
Comments:
Actuarial Justification
Past and Projected Experience - NW
Inforce by State as of 9/30/2008
Attachment:
Act Memo.pdf

Satisfied -Name: Authorization to File **Review Status:** Accepted for Informational Purposes 01/22/2009
Comments:
Attached.
Attachment:
NWauth.pdf

Nationwide Life Insurance Company

**Actuarial Justification for Individual A&H Rate Increase
Individual Medicare Supplement Pre-Standardized Forms**

1. PURPOSE

The purpose of this rate filing is to request a 10% rate increase for Nationwide Life's Individual Pre-Standardized Medicare Supplement plans and to demonstrate that, after the requested rate increase, minimum lifetime loss ratio requirements are met. It is not intended to be used for any other purpose.

2. SCOPE

This filing applies to all of Nationwide Life's Individual Pre-Standardized Medicare Supplement plans. All plans are pooled and will continue to be pooled in the future. This is a closed block of business.

The number of policies, annualized premium, and average premium inforce by state as of 9/30/2008 is shown in Exhibit D.

3. BENEFITS

The benefits provided by these plans supplement those benefits provided by Medicare.

4. MARKETING METHOD

These plans were sold through agents and brokers.

5. RATE INCREASE REQUEST AND REASON FOR REQUEST

A 10% rate increase is being requested in order to bring current and lifetime loss ratios back to acceptable levels and to offset increases in Medicare Part A and Part B deductibles, changes in Medicare fee schedules, and other increases in cost, utilization, and technology.

Exhibit A details the current and requested rate schedules.

6. RATE INCREASE HISTORY

Exhibit B details the rate increase history for these plans.

7. RATE JUSTIFICATION STANDARD

This filing demonstrates that both the lifetime loss ratio and the projected future loss ratio are in excess of required minimum loss ratio standards.

Type of Business:	Individual Pre-Standardized Medicare Supplement
Renewability:	Guaranteed Renewable
Required Lifetime Loss Ratio:	65%

Nationwide Life Insurance Company

**Actuarial Justification for Individual A&H Rate Increase
Individual Medicare Supplement Pre-Standardized Forms**

8. PROJECTION ASSUMPTIONS

Interest - A 4.5% interest rate has been used for accumulating past earned premiums and incurred claims and for discounting projected future earned premiums and incurred claims.

Terminations - A 15% total termination rate (lapses and deaths combined) has been assumed for purposes of projecting future earned premiums and incurred claims.

Claims - Current claim levels have been projected assuming a 9.5% annual medical trend for all years. Additionally, annual increases of 2% have been assumed to account for aging.

Premiums - The effective date for the 10% increase is assumed to be 4/1/2009, with the increase effective for any particular policy on the next policy anniversary on or following this effective date. Future rate increases equal to the 9.5% medical trend have been assumed to be effective annually. Of course, those future increases are not being requested at this time, filings for those increases will be made each year, as appropriate.

9 HISTORICAL AND PROJECTED EXPERIENCE

Exhibit C details the nationwide historical and projected future experience. The results of Exhibit C are summarized below assuming accumulated and present values are calculated at an interest rate of 4.5%.

	Earned Premium	Incurred Claims	Loss Ratio
Assuming a 10% rate increase			
Historical	106,396,217	73,076,844	68.7%
Projected	16,627,309	13,778,910	82.9%
Lifetime	123,023,526	86,855,754	70.6%
Assuming no rate increase			
Historical	106,396,217	73,076,844	68.7%
Projected	15,208,430	13,778,910	90.6%
Lifetime	121,604,647	86,855,754	71.4%

The projected future loss ratio and the lifetime loss ratio are in excess of the required minimum loss ratio of 65%.

Nationwide Life Insurance Company

**Actuarial Justification for Individual A&H Rate Increase
Individual Medicare Supplement Pre-Standardized Forms**

10. ACTUARIAL CERTIFICATION

I hereby certify that, to the best of my knowledge and belief, the rate filing submitted herein was prepared based on the current standards of practice as promulgated by the Actuarial Standards Board including the data quality standard of practice; the assumptions present my best judgment as to the expected value for each assumption and are consistent with the Company's business plan; the anticipated loss ratio, future loss ratio, and third year loss ratio all exceed the applicable minimum; the anticipated loss ratio submitted herein is expected to develop over the period for which rates are computed to provide coverage; and that the benefits are reasonable in relation to the proposed premiums.

Respectfully submitted,

Eric W. Perry ASA, MAAA
Assistant Vice President and Pricing Actuary
Universal American Corporation

Attachments:

Exhibit A: Requested Premium Rates

Exhibit B: Rate Increase History

Exhibit C: Experience Projection and Lifetime Loss Ratio Calculation

Exhibit D: Premium and Policies In Force by State as of 9/30/2008

Nationwide Life Insurance Company
Actuarial Justification for Individual A&H Rate Increase
Individual Medicare Supplement Pre-Standardized Forms
Exhibit C - Nationwide Historical and Projected Future Experience with 10% Rate Increase

	Actual Earned Premium	Rate Increase	Attained Age Increase	Effective Date	Current Rate Factor	Annual Termtn Rate	Persis- tency Factor	Earned Premium at Current Rates	Actual Incurred Claims	Annual Medical Trend	Annual Aging	Current Claim Factor	Seasnly Factor	Incurred Claims at Current Levels	Loss Ratio at Current Levels	Actual Loss Ratio
Historical																
1983	191,338								268,204							140.17%
1984	730,231								262,650							35.97%
1985	1,164,317								539,836							46.37%
1986	1,488,101								641,572							43.11%
1987	1,629,667								665,618							40.84%
1988	1,700,928								732,682							43.08%
1989	1,866,683								916,251							49.08%
1990	2,172,803								1,245,372							57.32%
1991	2,723,732								1,425,263							52.33%
1992	3,593,807								2,068,834							57.57%
1993	3,411,738								2,285,898							67.00%
1994	3,223,794								2,335,479							72.45%
1995	3,044,412								2,298,869							75.51%
1996	2,948,683								2,490,698							84.47%
1997	2,872,518								2,568,287							89.41%
1998	2,788,045								2,583,521							92.66%
1999	2,831,993								3,040,852							107.37%
2000	2,912,565								2,403,288							82.51%
2001	3,020,153								2,456,545							81.34%
2002	3,042,315								2,241,783							73.69%
2003	2,932,424								2,093,299							71.38%
2004	2,774,327				1.4623			4,056,795	2,203,085	8.5%		1.4439	1.0000	3,180,965	78.41%	79.41%
2005	2,621,144				1.3678			3,585,144	2,027,810	8.5%		1.3308	1.0000	2,698,516	75.27%	77.36%
2006	2,450,535				1.2652			3,100,304	1,905,275	8.5%		1.2265	1.0000	2,336,823	75.37%	77.75%
2007	2,315,974				1.1342			2,626,707	1,683,784	10.0%		1.1227	1.0000	1,890,355	71.97%	72.70%
3Q2008	1,650,821				1.0375			1,712,770	1,211,712	9.5%		1.0346	0.9946	1,260,418	73.59%	73.40%

Projected Experience with Rate Increase

	Actual Earned Premium	Rate Increase	Attained Age Increase	Effective Date	Current Rate Factor	Annual Termtn Rate	Persis- tency Factor	Earned Premium at Current Rates	Actual Incurred Claims	Annual Medical Trend	Annual Aging	Current Claim Factor	Seasnly Factor	Incurred Claims at Current Levels	Loss Ratio at Current Levels	Actual Loss Ratio
Total 2008	2,178,925							2,240,874	1,606,156					1,643,860	73.36%	73.7%
Rest 2008	528,104		0.0%		1.0000	0.1500	0.9250	528,104	394,444	9.5%	2.0%	0.9887	1.0171	383,442	72.61%	74.69%
2009	2,044,115	10.0%	0.0%	4/1/2009	0.9318	0.1500	0.8500	1,904,743	1,510,000	9.5%	2.0%	0.9342	1.0000	1,410,640	74.06%	73.87%
2010	1,904,883	9.5%	0.0%	4/1/2010	0.8499	0.1500	0.8500	1,619,032	1,433,541	9.5%	2.0%	0.8531	1.0000	1,223,025	75.54%	75.26%
2011	1,772,970	9.5%	0.0%	4/1/2011	0.7762	0.1500	0.8500	1,376,177	1,360,954	9.5%	2.0%	0.7791	1.0000	1,060,363	77.05%	76.76%
2012	1,650,191	9.5%	0.0%	4/1/2012	0.7089	0.1500	0.8500	1,169,750	1,292,042	9.5%	2.0%	0.7115	1.0000	919,335	78.59%	78.30%
2013	1,535,916	9.5%	0.0%	4/1/2013	0.6474	0.1500	0.8500	994,288	1,226,619	9.5%	2.0%	0.6498	1.0000	797,063	80.16%	79.86%
2014	1,429,554	9.5%	0.0%	4/1/2014	0.5912	0.1500	0.8500	845,145	1,164,509	9.5%	2.0%	0.5934	1.0000	691,054	81.77%	81.46%
2015	1,330,557	9.5%	0.0%	4/1/2015	0.5399	0.1500	0.8500	718,373	1,105,544	9.5%	2.0%	0.5419	1.0000	599,144	83.40%	83.09%
2016	1,238,416	9.5%	0.0%	4/1/2016	0.4931	0.1500	0.8500	610,617	1,049,565	9.5%	2.0%	0.4949	1.0000	519,457	85.07%	84.75%
2017	1,152,656	9.5%	0.0%	4/1/2017	0.4503	0.1500	0.8500	519,024	996,421	9.5%	2.0%	0.4520	1.0000	450,370	86.77%	86.45%
2018	1,072,834	9.5%	0.0%	4/1/2018	0.4112	0.1500	0.8500	441,171	945,967	9.5%	2.0%	0.4128	1.0000	390,470	88.51%	88.17%
2019	998,540	9.5%	0.0%	4/1/2019	0.3755	0.1500	0.8500	374,995	898,068	9.5%	2.0%	0.3770	1.0000	338,538	90.28%	89.94%
2020	929,391	9.5%	0.0%	4/1/2020	0.3430	0.1500	0.8500	318,746	852,594	9.5%	2.0%	0.3443	1.0000	293,512	92.08%	91.74%
2021	865,031	9.5%	0.0%	4/1/2021	0.3132	0.1500	0.8500	270,934	809,423	9.5%	2.0%	0.3144	1.0000	254,475	93.93%	93.57%
2022	805,128	9.5%	0.0%	4/1/2022	0.2860	0.1500	0.8500	230,294	768,438	9.5%	2.0%	0.2871	1.0000	220,630	95.80%	95.44%
2023	749,373	9.5%	0.0%	4/1/2023	0.2612	0.1500	0.8500	195,750	729,528	9.5%	2.0%	0.2622	1.0000	191,286	97.72%	97.35%
2024	697,479	9.5%	0.0%	4/1/2024	0.2386	0.1500	0.8500	166,387	692,588	9.5%	2.0%	0.2395	1.0000	165,845	99.67%	99.30%
2025	649,178	9.5%	0.0%	4/1/2025	0.2179	0.1500	0.8500	141,429	657,519	9.5%	2.0%	0.2187	1.0000	143,788	101.67%	101.28%
2026	604,223	9.5%	0.0%	4/1/2026	0.1990	0.1500	0.8500	120,215	624,226	9.5%	2.0%	0.1997	1.0000	124,664	103.70%	103.31%
2027	562,380	9.5%	0.0%	4/1/2027	0.1817	0.1500	0.8500	102,183	592,618	9.5%	2.0%	0.1824	1.0000	108,084	105.77%	105.38%

Lifetime Present Values at 4.5% with Rate Increase

Historical	106,396,217								73,076,844							68.68%
Projected	16,627,309								13,778,910							82.87%
Total	123,023,526								86,855,754							70.60%

Projected Experience without Rate Increase

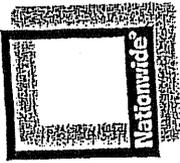
	Actual Earned Premium	Rate Increase	Attained Age Increase	Effective Date	Current Rate Factor	Annual Termtn Rate	Persis- tency Factor	Earned Premium at Current Rates	Actual Incurred Claims	Annual Medical Trend	Annual Aging	Current Claim Factor	Seasnly Factor	Incurred Claims at Current Levels	Loss Ratio at Current Levels	Actual Loss Ratio
Total 2008	2,178,925							2,240,874	1,606,156					1,643,860	73.36%	73.7%
Rest 2008	528,104		0.0%		1.0000	0.1500	0.9250	528,104	394,444	9.5%	2.0%	0.9887	1.0171	383,442	72.61%	74.69%
2009	1,904,743	0.0%	0.0%	4/1/2009	1.0000	0.1500	0.8500	1,904,743	1,510,000	9.5%	2.0%	0.9342	1.0000	1,410,640	74.06%	79.28%
2010	1,731,712	9.5%	0.0%	4/1/2010	0.9349	0.1500	0.8500	1,619,032	1,433,541	9.5%	2.0%	0.8531	1.0000	1,223,025	75.54%	82.78%
2011	1,611,791	9.5%	0.0%	4/1/2011	0.8538	0.1500	0.8500	1,376,177	1,360,954	9.5%	2.0%	0.7791	1.0000	1,060,363	77.05%	84.44%
2012	1,500,174	9.5%	0.0%	4/1/2012	0.7797	0.1500	0.8500	1,169,750	1,292,042	9.5%	2.0%	0.7115	1.0000	919,335	78.59%	86.13%
2013	1,396,287	9.5%	0.0%	4/1/2013	0.7121	0.1500	0.8500	994,288	1,226,619	9.5%	2.0%	0.6498	1.0000	797,063	80.16%	87.85%
2014	1,299,594	9.5%	0.0%	4/1/2014	0.6503	0.1500	0.8500	845,145	1,164,509	9.5%	2.0%	0.5934	1.0000	691,054	81.77%	89.61%
2015	1,209,597	9.5%	0.0%	4/1/2015	0.5939	0.1500	0.8500	718,373	1,105,544	9.5%	2.0%	0.5419	1.0000	599,144	83.40%	91.40%
2016	1,125,833	9.5%	0.0%	4/1/2016	0.5424	0.1500	0.8500	610,617	1,049,565	9.5%	2.0%	0.4949	1.0000	519,457	85.07%	93.23%
2017	1,047,869	9.5%	0.0%	4/1/2017	0.4953	0.1500	0.8500	519,024	996,421	9.5%	2.0%	0.4520	1.0000	450,370	86.77%	95.09%
2018	975,304	9.5%	0.0%	4/1/2018	0.4523	0.1500	0.8500	441,171	945,967	9.5%	2.0%	0.4128	1.0000	390,470	88.51%	96.99%
2019	907,764	9.5%	0.0%	4/1/2019	0.4131	0.1500	0.8500	374,995	898,068	9.5%	2.0%	0.3770	1.0000	338,538	90.28%	98.93%
2020	844,901	9.5%	0.0%	4/1/2020	0.3773	0.1500	0.8500	318,746	852,594	9.5%	2.0%	0.3443	1.0000	293,512	92.08%	100.91%
2021	786,392	9.5%	0.0%	4/1/2021	0.3445	0.1500	0.8500	270,934	809,423	9.5%	2.0%	0.3144	1.0000	254,475	93.93%	102.93%
2022	731,934	9.5%	0.0%	4/1/2022	0.3146	0.1500	0.8500	230,294	768,438	9.5%	2.0%	0.2871	1.0000	220,630	95.80%	104.99%
2023	681,248	9.5%	0.0%	4/1/2023	0.2873	0.1500	0.8500	195,750	729,528	9.5%	2.0%	0.2622	1.0000	191,286	97.72%	107.09%
2024	634,071	9.5%	0.0%	4/1/2024	0.2624	0.1500	0.8500	166,387	692,588	9.5%	2.0%	0.2395	1.0000	165,845	99.67%	109.23%
2025	590,162	9.5%	0.0%	4/1/2025	0.2396	0.1500	0.8500	141,429	657,519	9.5%	2.0%	0.2187	1.0000	143,788	101.67%	111.41%
2026	549,293	9.5%	0.0%	4/1/2026	0.2189	0.1500	0.8500	120,215	624,226	9.5%	2.0%	0.1997	1.0000	124,664	103.70%	113.64%
2027	511,255	9.5%	0.0%	4/1/2027	0.1999	0.1500	0.8500	102,183	592,618	9.5%	2.0%	0.1824	1.0000	108,084	105.77%	115.91%

Lifetime Present Values at 4.5% without Rate Increase

Historical	106,396,217								73,076,844							68.68%
Projected	15,208,430								13,778,910							90.60%
Total	121,604,647								86,855,754							71.42%

Nationwide Life Insurance Company
Actuarial Justification for Individual A&H Rate Increase
Medicare Supplement Pre-Standardized Forms
Exhibit D: In Force As Of 09/30/2008

State	Annualized Premium	Policy Count	Average Size Premium	
			Before	After
AL	17,502	5	3,500	3,850
AR	12,253	4	3,063	3,370
DE	12,329	5	2,466	2,712
FL	241,117	166	1,453	1,598
GA	53,771	27	1,992	2,191
IL	2,796	1	2,796	3,076
IN	41,292	14	2,949	3,244
KY	46,709	19	2,458	2,704
ME	3,541	1	3,541	3,895
MS	41,104	12	3,425	3,768
NC	321,880	148	2,175	2,392
OH	430,837	145	2,971	3,268
OR	5,651	2	2,826	3,108
PA	311,960	117	2,666	2,933
SC	102,279	45	2,273	2,500
TN	58,042	21	2,764	3,040
VA	236,611	88	2,689	2,958
WV	250,535	101	2,481	2,729
Grand Total	2,190,209	921	2,378	2,616



NATIONWIDE LIFE INSURANCE COMPANY
Home Office: One Nationwide Plaza
Columbus, OH 43215 - 2220

NAIC # 66869

To: To Whom It May Concern
Re: Authorization to submit individual Medicare Supplement rate filings for Nationwide Life Insurance Company

This letter, or a copy thereof, authorizes Carmen Boyd, the Director of Actuarial Compliance with Universal American Financial Corporation (UAFC), to submit rate filings to your Department on behalf of Nationwide Life Insurance Company for the individual standardized and pre-standardized Medicare Supplement block of business administered by UAFC.

This authorization shall remain valid until revoked by Nationwide Life Insurance Company.

NATIONWIDE LIFE INSURANCE COMPANY

Joe San Filippo, Vice President
Nationwide Life Insurance Company
June 30, 2003