

SERFF Tracking Number: AEGJ-126492629 State: Arkansas
Filing Company: Transamerica Life Insurance Company State Tracking Number: 44807
Company Tracking Number: ADV APB POM
TOI: LTC03I Individual Long Term Care Sub-TOI: LTC03I.001 Qualified
Product Name: APB POM
Project Name/Number: ADV APB POM/ADV APB POM

Filing at a Glance

Company: Transamerica Life Insurance Company

Product Name: APB POM SERFF Tr Num: AEGJ-126492629 State: Arkansas
TOI: LTC03I Individual Long Term Care SERFF Status: Closed-Filed State Tr Num: 44807
Sub-TOI: LTC03I.001 Qualified Co Tr Num: ADV APB POM State Status: Closed
Filing Type: Advertisement Reviewer(s): Marie Bennett
Disposition Date: 03/15/2010
Authors: Julie Maclin, Joan Shumaker, Patsy Holt
Date Submitted: 02/09/2010 Disposition Status: Filed
Implementation Date Requested: Implementation Date:

State Filing Description:

General Information

Project Name: ADV APB POM Status of Filing in Domicile:
Project Number: ADV APB POM Date Approved in Domicile:
Requested Filing Mode: Review & Approval Domicile Status Comments:
Explanation for Combination/Other: Market Type: Individual
Submission Type: New Submission Group Market Size:
Overall Rate Impact: Group Market Type:
Filing Status Changed: 03/15/2010 Explanation for Other Group Market Type:
State Status Changed: 03/15/2010

Deemer Date:

Submitted By: Julie Maclin

Filing Description:

Please see cover letter under Supporting Documentation tab.

Company and Contact

Filing Contact Information

Julie Maclin, Senior Policy Analyst jmaclin@aegonusa.com
P.O. Box 93007 800-553-7600 [Phone] 3446 [Ext]
Hurst, TX 76053-3007 817-285-3394 [FAX]

Filing Company Information

Transamerica Life Insurance Company CoCode: 86231 State of Domicile: Iowa

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 Product Name: APB POM
 Project Name/Number: ADV APB POM/ADV APB POM
 P O Box 93005 Group Code: 468 Company Type:
 Hurst, TX 76053-3005 Group Name: State ID Number:
 (800) 553-7600 ext. [Phone] FEIN Number: 39-0989781

Filing Fees

Fee Required? Yes
 Fee Amount: \$100.00
 Retaliatory? No
 Fee Explanation: \$50 per ad x 2 ads = \$50
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Transamerica Life Insurance Company	\$50.00	02/09/2010	34087339

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed	Marie Bennett	03/15/2010	03/15/2010

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending	Marie Bennett	02/12/2010	02/12/2010	Julie Maclin	02/16/2010	02/16/2010
Industry Response						

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Form	Pool of Money Brainshark	Julie Maclin	03/03/2010	03/03/2010

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Disposition

Disposition Date: 03/15/2010

Implementation Date:

Status: Filed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: AEGJ-126492629 State: Arkansas
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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Variables	Filed	Yes
Supporting Document	Cover Letter	Filed	Yes
Form	Alternative Payment Brainshark	Filed	Yes
Form (revised)	Pool of Money Brainshark	Filed	Yes
Form	Pool of Money Brainshark	Replaced	Yes

SERFF Tracking Number: AEGJ-126492629 State: Arkansas
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Project Name/Number: ADV APB POM/ADV APB POM

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 02/12/2010
Submitted Date 02/12/2010
Respond By Date 03/12/2010

Dear Julie Maclin,

This will acknowledge receipt of the captioned filing.

We ask that the sentence below (following Comments) be deleted from the advertising piece as it could be misleading.

Objection 1

- Pool of Money Brainshark, TLC POM PRS 0909 (Form)

Comment: If you pay into an insurance plan for years, you should be able to receive all of it, and not be limited to only a portion because your policy is limited by a number of years.

Please feel free to contact me if you have questions.

Sincerely,

Marie Bennett

Response Letter

Response Letter Status Submitted to State
Response Letter Date 02/16/2010
Submitted Date 02/16/2010

Dear Marie Bennett,

Comments:

Response 1

Comments: I am confused as to what the objection is. The above sentence is a direct quote from the presenter's notes from the Powerpoint presentation. Can you please explain? Thank you.

Related Objection 1

Applies To:

- Pool of Money Brainshark, TLC POM PRS 0909 (Form)

Comment:

SERFF Tracking Number: *AEGJ-126492629* *State:* *Arkansas*
Filing Company: *Transamerica Life Insurance Company* *State Tracking Number:* *44807*
Company Tracking Number: *ADV APB POM*
TOI: *LTC03I Individual Long Term Care* *Sub-TOI:* *LTC03I.001 Qualified*
Product Name: *APB POM*
Project Name/Number: *ADV APB POM/ADV APB POM*

If you pay into an insurance plan for years, you should be able to receive all of it, and not be limited to only a portion because your policy is limited by a number of years.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,

Joan Shumaker, Julie Maclin, Patsy Holt

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Amendment Letter

Submitted Date: 03/03/2010

Comments:

Ms. Bennett,

Pursuant to our recent telephone conversation, revisions have been made to the wording of TLC POM PRS AR 0909 to better explain the policy's maximum benefit as a "pool of money", rather than a number of years. Please let me know if this is acceptable. Thank you.

Changed Items:

Form Schedule Item Changes:

Form Schedule Item Changes:

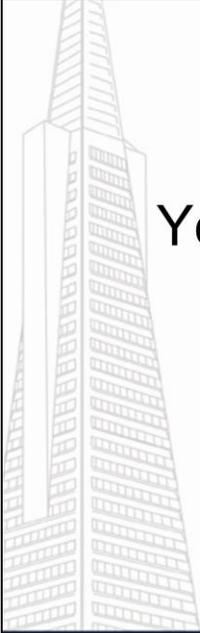
Form Number	Form Type	Form Name	Action	Form Action Other	Previous Filing #	Replaced Form #	Readability Score	Attachments
TLC POM PRS 0909	Advertising	Pool of Money Brainshark	Initial				0.000	TLC POM PRS AR 0909.pdf

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Form Schedule

Lead Form Number:

Schedule Item	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
Filed 03/15/2010	TLC APB PRS 0909	Advertising	Alternative Payment Brainshark	Initial		0.000	1TLC APB PRS 0909 filing.pdf
Filed 03/15/2010	TLC POM PRS 0909	Advertising	Pool of Money Brainshark	Initial		0.000	TLC POM PRS AR 0909.pdf



With [TransCare Options®]
You Can Choose How To Use
Your Benefits

The Alternative Payment Benefit

Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company



TLC APB PRS 0909

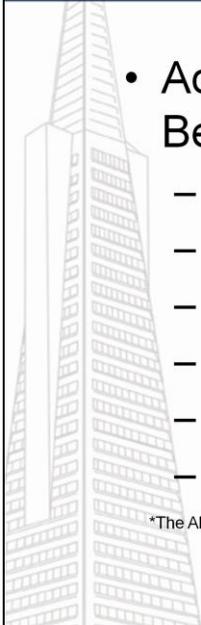
TRANSAMERICA LIFE INSURANCE COMPANY

Hard work and planning for your future are key to helping preserve your freedom of choice and standard of living. Purchasing [TransCare Options®] Long Term Care insurance from Transamerica Life Insurance Company is a great way to do both. But not all Long Term Care insurance policies are alike.

In this short presentation, we will discuss the Alternative Payment Benefit, one of the benefits in the [TransCare Options®] policy that sets our product apart from competing products and provides you the opportunity to choose how you would like to spend your benefits.

The Alternative Payment Benefit

TransCare Options®
A Plan Designed for a Changing Future®

- 
- Advantages of the Alternative Payment Benefit
 - Provides freedom of choice
 - Pays benefits directly to you
 - No need to submit receipts
 - Use the money any way you want
 - 0-day Elimination Period*
 - May help extend the life of the policy

*The Alternative Payment Benefit does not satisfy the Elimination Period that may apply to other benefits.

Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company

TRANSAMERICA
LONG TERM CARE

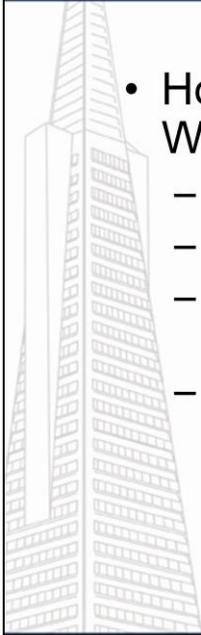
TRANSAMERICA LIFE INSURANCE COMPANY

The Alternative Payment Benefit gives you many choices in the way to use your benefits. In lieu of all other benefits for care or services, it pays benefits directly to you. There is no need to submit receipts, you do not have to wait for reimbursement or even explain how you are using the money. It is all up to you!

Once you qualify for benefits, you can pay a family member who is providing care for you, or you can receive care in another country. You have the choice to use the payments any way you see fit.

[And one of the best features of the Alternative Payment Benefit is that there is a 0-day Elimination Period. An Elimination Period is like a deductible. You have to wait a certain amount of time before you can claim benefits. But with the Alternative Payment Benefit, you don't have to wait. The 0-day Elimination Period means you are eligible from the first day of benefit eligibility.]

The Alternative Payment Benefit may also extend the life of your policy. [TransCare Options®] pays benefits based on a pool of money, not on time. Since the Alternative Payment Benefit pays 1/3 of your Monthly Maximum Benefit at a time, the remaining benefit stays in your pool of money for future use.



- How the Alternative Payment Benefit Works
 - Qualify for benefits
 - Request the Alternative Payment Benefit
 - [Begin receiving benefits from the first day of benefit eligibility]
 - A Care Coordinator or Licensed Practitioner will need to complete an updated Plan of Care every 60 days for the benefit to continue

Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company

TRANSAMERICA
LONG TERM CARE

TRANSAMERICA LIFE INSURANCE COMPANY

The way the Alternative Payment Benefit works is a rather simple process. First you need to qualify for benefits. Your Policy or Outline of Coverage will explain how you qualify for benefits in further detail.

Then a Plan of Care will be submitted to Transamerica Life on your behalf. A plan of care is the list of long term care services and care you need, developed by your Care Coordinator or other licensed health care practitioner in conjunction with you and/or your family. You may then request to use your Alternative Payment Benefit.

You will begin receiving a lump sum each month equal to 10 times your Maximum Daily Benefit. [Since the Alternative Payment Benefit has a 0-day Elimination Period, you can begin receiving benefits from the first day of benefit eligibility.]

As you receive benefits, your Care Coordinator or Licensed Practitioner will need to complete and send to Transamerica Life an updated Plan of Care every 60 days for the benefit to continue. You may receive this benefit as long as you remain eligible for benefits, or until you wish to use other benefits in your policy.



- What Does the Alternative Payment Benefit Pay?
 - Pays 10 times the Maximum Daily Benefit (MDB)
Example: MDB=\$200 X 10 = \$2,000 per month
 - Lump sum paid directly to you to use any way that you see fit
 - Pay for care by a family member
 - Receive care worldwide

Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company

TRANSAMERICA
LONG TERM CARE

TRANSAMERICA LIFE INSURANCE COMPANY

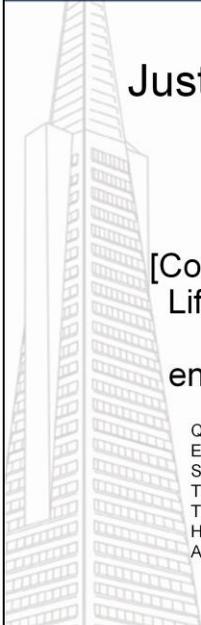
The Alternative Payment Benefit pays benefits based on your Maximum Daily Benefit. It pays 10 times your Maximum Daily Benefit or 1/3 your Maximum Monthly Benefit.

For example, if your Maximum Daily Benefit is \$200 a day, you will multiply that by 10 and the Alternative Payment Benefit amount will be \$2,000 per month.

That means as long as you meet benefit-eligibility, you will receive a lump sum of \$2,000 per month and be able to use that amount any way you see fit. You can pay for care by a family member, or even receive care in another country. It is completely up to you. You decide how you would like to use this benefit.

The Alternative Payment Benefit

TransCare Options®
A Plan Designed for a Changing Future®



Just one of the many innovative features
of the [TransCare Options®] Long
Term Care insurance policy.

[Contact [Insurance Producer Name/ Transamerica
Life] at [XXX-XXX-XXXX] to learn more] [or] [attend
an upcoming insurance sales seminar and
enrollment meeting] [on XXX, XXXX-XX, XX, XXX].

Qualifying for benefits is required. Premiums and benefits vary depending upon the plan selected.
Exclusions and limitations apply. Options and benefits may differ and are not available in all states.
See the Outline of Coverage for complete policy benefits and details. Policy series TLC 1-FP 1001 or
TLC 1-FP 402 (In ID: TLC 1-P (ID) 408; In LA: TLC 1-P (LA) 504; In OK: TLC 1-FP (OK) 709).
Transamerica Life Insurance Company
Home Office: Cedar Rapids, IA
Administrative Office: P. O. Box 95302, Hurst, TX 76053

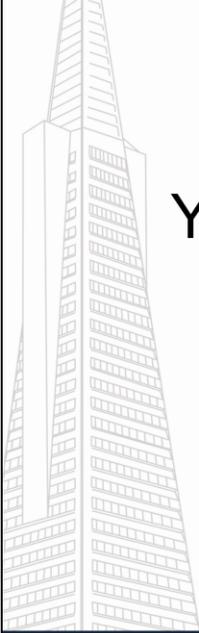
Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company

 **TRANSAMERICA**
LONG TERM CARE

TRANSAMERICA LIFE INSURANCE COMPANY

[TransCare Options®] helps you prepare for the unknown, helps protect your assets from the high cost of long term care and helps you plan for a changing future.

If you have any questions or would like to learn more about [TransCare Options®] please [contact Insurance Producer Name/Transamerica Life] at [XXX-XXX-XXXX] [or] [attend an upcoming enrollment meeting].



With [TransCare Options®] You Can Take Charge of How You Use Your Benefits

Pool of Money

Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company



TLC POM PRS AR 0909

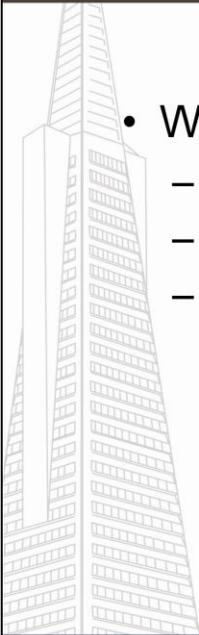
TRANSAMERICA LIFE INSURANCE COMPANY

Hard work and planning for your future are key to helping preserve your freedom of choice and standard of living. Purchasing [TransCare Options®] Long Term Care insurance from Transamerica Life Insurance Company is a great way to do both. But not all Long Term Care insurance policies are alike.

In this short presentation, we will discuss the Pool of Money approach, one of the features of the [TransCare Options®] policy that sets our product apart from other competing products.

Pool of Money

TransCare Options®
A Plan Designed for a Changing Future®



- What is a Pool of Money?
 - Maximum Benefit based on dollars
 - No set number of years
 - Benefits will be paid until the Pool of Money is exhausted

Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company

TRANSAMERICA
LONG TERM CARE

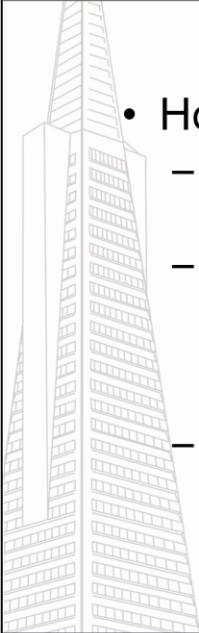
TRANSAMERICA LIFE INSURANCE COMPANY

The Pool of Money is the Maximum Benefit for the Policy. Sometimes the Maximum Benefit is stated in terms of months or years, but not with [TransCare Options®]. Your money is your money. So, [Transcare Options®] benefit plans state your maximum benefit in terms of dollars, not time.

When you access benefits and use less than the Maximum Daily Benefit, the remaining unused portion will remain in the Pool of Money until the funds have been used.

Pool of Money

TransCare Options®
A Plan Designed for a Changing Future®



- How can a Pool of Money help?
 - May allow you to extend the life of the Policy
 - Lets you save early when less benefits may be needed and up to the Maximum Daily Benefit if you need additional services
 - You will not lose access to benefits while you are eligible as long as you have a Pool of Money

Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company

TRANSAMERICA
LONG TERM CARE

TRANSAMERICA LIFE INSURANCE COMPANY

By using the Pool of Money feature [TransCare Options®] allows you to lengthen the life of your policy beyond a set number of years. A Pool of Money also allows you to use less than the Maximum Daily Benefit during the early years of benefit eligibility when less services may be needed. Then you can spend up to the Maximum Daily Benefit if you need additional services later in life. So, you will have access to benefits as long as you have funds in your Pool of Money. The Policy may last months or even years longer than you originally thought depending on your needs and their expense.

Pool of Money

TransCare Options®
A Plan Designed for a Changing Future®



Just one of the many innovative features
of the [TransCare Options®] Long Term
Care insurance policy.

[Contact [Insurance Producer Name/ Transamerica
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an upcoming insurance sales seminar and
enrollment meeting] [on XXX, XXXX-XX, XX, XXX].

Qualifying for benefits is required. Premiums and benefits vary depending upon the plan selected.
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or TLC 1-FP 402 (In ID: TLC 1-P (ID) 408; In LA: TLC 1-P (LA) 504; In OK: TLC 1-FP (OK) 709).
Transamerica Life Insurance Company
Home Office: Cedar Rapids, IA
Administrative Office: P. O. Box 95302, Hurst, TX 76053

Individual Long Term Care Insurance
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LONG TERM CARE

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If you have any questions or would like to learn more about [TransCare Options®] please [contact Insurance Producer Name/Transamerica Life] at [XXX-XXX-XXXX] [or attend an upcoming enrollment meeting].

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Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Variables	Filed	03/15/2010
Comments:		
Attachment: 1APB POM PRS Variables.pdf		

	Item Status:	Status Date:
Satisfied - Item: Cover Letter	Filed	03/15/2010
Comments:		
Attachment: AR filing ltr multiple forms.pdf		

VARIABLES

TLC APB PRS 0909
TLC POM PRS 0909

Alternative Payment Benefit
Pool of Money

The Product Name is variable throughout each piece, depending upon the employer or association group it is being used for. The variables could be any of the following packages:

TransCare Options[®]
Transitions by Transamericasm
SecurePath LTCism
TransCare[®]

Last Page:

“[Contact Insurance Producer Name/Transamerica Life] at [XXX-XXX-XXXX] to learn more [or] [attend an upcoming insurance sales seminar and enrollment meeting] [on XXX, XXXX-XX, XX, XXX].” is variable depending upon the employer or association group and the date and time of the sales seminar and enrollment meeting. It will always be a licensed insurance producer/agent who talks with the customer about product benefits.

“If you have any questions or would like to learn more about [TransCare Options[®]] please [contact Insurance Producer Name/Transamerica Life] at [XXX-XXX-XXXX] [or] [attend an upcoming enrollment meeting].” is variable depending upon the employer or association group. It will always be a licensed insurance producer/agent who talks with the customer about product benefits.

TLC APB PRS 0909 **Alternative Payment Benefit**

“[And one of the best features of the Alternative Payment Benefit is that there is a 0-day Elimination Period. An Elimination Period is like a deductible. You have to wait a certain amount of time before you can claim benefits. But with the Alternative Payment Benefit, you don’t have to wait. The 0-day Elimination Period means you are eligible from the first day of benefit eligibility.]” will only be included if the 0-day EP is allowed in a particular state, and if the package which is being offered includes it in the package.

“[Begin receiving benefits from the first day of benefit eligibility]” will only be included if the 0-day EP is allowed in a particular state, and if the package which is being offered includes it in the package.

“[Since the Alternative Payment Benefit has a 0-day Elimination Period, you can begin receiving benefits from the first day of benefit eligibility.]” will only be included if the 0-day EP is allowed in a particular state, and if the package which is being offered includes it in the package.

TLC POM PRS 0909

Pool of Money

No additional variables



Home Office: Cedar Rapids, Iowa
Long Term Care Division
P O Box 95302
Hurst, Texas 76053-5302
800-553-7600, ext 3446
jmaclin@aegonusa.com

February 8, 2010

Commissioner Julie Benafield Bowman
1200 West Third Street
Little Rock, AR 72201

RE: **Long Term Care Advertising**
NAIC #: 86231
FEIN #: 39-0989781
Form # / Description: TLC APB PRS 0909 Invitation to Inquire PowerPoint Presentation
TLC POM PRS 0909 Invitation to Inquire PowerPoint Presentation

Dear Commissioner Bowman:

Enclosed are the referenced forms submitted for your review and approval. These forms are not intended to replace any previously approved forms.

These forms will be used to solicit policy form TLC 1-FP (AR) 206, et al., which was approved by your department on May 30, 2006.

It is our intention to use these forms in electronic format as follows. In our worksite/association business we send an email to employees/members with the link to the presentation. The customers who click on the link are taken to the slide presentation. The customer only sees the slides. A licensed insurance producer's voice speaks what is listed on the notes section of these materials.

Bracketed information is intended to be variable. Please see the attached Variables document.

We trust that these forms will meet with your approval. If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Julie A. Maclin".

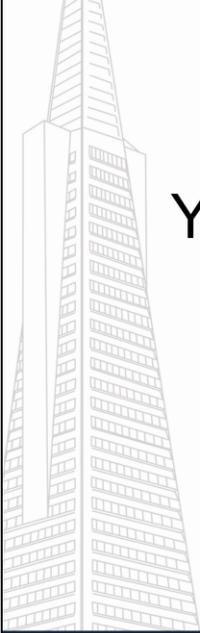
Julie A. Maclin, ACS
Senior Advertising Analyst
Long Term Care Division

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Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date:	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
02/08/2010	Form	Pool of Money Brainshark	03/03/2010	1TLC POM PRS 0909 filing.pdf (Superseded)



With [TransCare Options®] You Can Take Charge of How You Use Your Benefits

Pool of Money

Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company

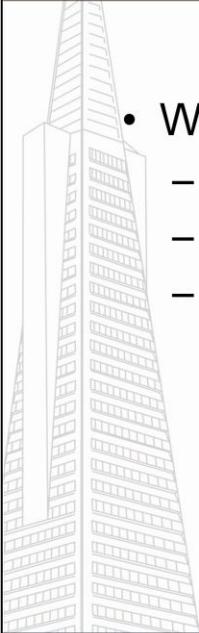


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TRANSAMERICA
LONG TERM CARE

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[Contact [Insurance Producer Name/ Transamerica
Life] at [XXX-XXX-XXXX] to learn more] [or] [attend
an upcoming insurance sales seminar and
enrollment meeting] [on XXX, XXXX-XX, XX, XXX].

Qualifying for benefits is required. Premiums and benefits vary depending upon the plan selected.
Exclusions and limitations apply. Options and benefits may differ and are not available in all states.
See the Outline of Coverage for complete policy benefits and details. Policy series TLC 1-FP 1001
or TLC 1-FP 402 (In ID: TLC 1-P (ID) 408; In LA: TLC 1-P (LA) 504; In OK: TLC 1-FP (OK) 709).
Transamerica Life Insurance Company
Home Office: Cedar Rapids, IA
Administrative Office: P. O. Box 95302, Hurst, TX 76053

Individual Long Term Care Insurance
Underwritten by Transamerica Life Insurance Company

 **TRANSAMERICA**
LONG TERM CARE

TRANSAMERICA LIFE INSURANCE COMPANY

[TransCare Options®] helps you prepare for the unknown, helps protect your assets from the high cost of long term care and helps you plan for a changing future.

If you have any questions or would like to learn more about [TransCare Options®] please [contact Insurance Producer Name/Transamerica Life] at [XXX-XXX-XXXX] [or attend an upcoming enrollment meeting].