

SERFF Tracking Number: GARD-126665719 State: Arkansas
 Filing Company: The Guardian Life Insurance Company of America State Tracking Number: 45914
 Company Tracking Number:
 TOI: H06 Health - Conversion Sub-TOI: H06.000 Health - Conversion
 Product Name: 10/1/2010 Arkansas Medical Rate Filing for Individual Health Conversion Plans
 Project Name/Number: /

Filing at a Glance

Company: The Guardian Life Insurance Company of America

Product Name: 10/1/2010 Arkansas Medical Rate Filing for Individual Health Conversion Plans
 SERFF Tr Num: GARD-126665719 State: Arkansas

TOI: H06 Health - Conversion SERFF Status: Closed-Approved- Closed State Tr Num: 45914

Sub-TOI: H06.000 Health - Conversion Co Tr Num: State Status: Approved-Closed
 Filing Type: Rate Reviewer(s): Rosalind Minor

Authors: Alison Serewko, Linda Disposition Date: 07/16/2010

Rappaport, Rimma Kosubevsky

Date Submitted: 06/09/2010 Disposition Status: Approved-Closed

Implementation Date Requested: On Approval
 State Filing Description:

Implementation Date:

General Information

Project Name:
 Project Number:
 Requested Filing Mode: Review & Approval
 Explanation for Combination/Other:
 Submission Type: New Submission
 Overall Rate Impact: 21.2%
 Filing Status Changed: 07/16/2010

Status of Filing in Domicile:
 Date Approved in Domicile:
 Domicile Status Comments:
 Market Type: Individual
 Group Market Size:
 Group Market Type:
 Explanation for Other Group Market Type:
 State Status Changed: 07/16/2010
 Created By: Alison Serewko
 Corresponding Filing Tracking Number:

Deemer Date:
 Submitted By: Linda Rappaport
 PPACA: Pre-PPACA Submission
 Filing Description:

We are filing for a 20% increase in premium effective on or after October 1, 2010, which will be applicable to new and inforce business for the policy form HC-P-85. Rates will increase on policyholder anniversaries.
 We are filing for a 1.9% increase in premium due to health care reform effective on or after September 23, 2010 which will be applicable to inforce business for the policy form HC-P-85. Rates will increase on policyholder anniversaries.

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We are filing for a 1.0% increase in premium due to health care reform effective on or after September 23, 2010 which will be applicable to new business issued after September 23, 2010 for the policy form HC-P-85.

We are filing for a 4.5% quarterly trend effective on October 1, 2011, which will be applicable to new and inforce business for the policy form HC-P-85. Rates will increase on policyholder anniversaries.

The overall impact of these changes is a 21.2% increase in premiums for inforce business and a 27.8% increase for new business issued on or after October 1, 2010.

Company and Contact

Filing Contact Information

Alison Weisvogel, alison_weisvogel@glic.com
 7 Hanover Square 212-598-7884 [Phone]
 Mail Station 22-C 212-919-2460 [FAX]
 New York, NY 10004

Filing Company Information

The Guardian Life Insurance Company of America CoCode: 64246 State of Domicile: New York
 7 Hanover Square Group Code: 429 Company Type: Life
 New York, NY 10004 Group Name: State ID Number:
 (212) 598-8704 ext. [Phone] FEIN Number: 13-5123390

Filing Fees

Fee Required? Yes
 Fee Amount: \$50.00
 Retaliatory? No
 Fee Explanation:
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
The Guardian Life Insurance Company of America	\$50.00	06/09/2010	37115515

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Rosalind Minor	07/16/2010	07/16/2010

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Rosalind Minor	07/12/2010	07/12/2010	Alison Serewko	07/15/2010	07/15/2010

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Disposition

Disposition Date: 07/16/2010

Implementation Date:

Status: Approved-Closed

Comment:

We have approved a 11.1% level rate increase on your submission. The approval is subject to the following conditions:

1. Rate increases will not be given prior to the first annual anniversary date of any policy.
2. After the first annual anniversary date of any policy, increases will not be given more frequently than once in a twelve (12) month period.
3. All increases in rates, other than a change in age or an individual moving to another geographical area, must be submitted to our Department for approval.

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
The Guardian Life Insurance Company of America	21.200%	21.300%	\$3,880	3	\$18,303	%	%

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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document (revised)	Health - Actuarial Justification	Approved-Closed	No
Supporting Document	Health - Actuarial Justification	Replaced	No
Supporting Document	Cover letter	Approved-Closed	Yes
Supporting Document	Policy Rider	Approved-Closed	Yes
Supporting Document (revised)	Exhibits A - C	Approved-Closed	No
Supporting Document	Exhibits A - C	Replaced	No
Supporting Document	Response Letter	Approved-Closed	Yes

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Objection Letter

Objection Letter Status Pending Industry Response

Objection Letter Date 07/12/2010

Submitted Date 07/12/2010

Respond By Date

Dear Alison Weisvogel,

This will acknowledge receipt of the captioned filing.

Objection 1

- Health - Actuarial Justification (Supporting Document)

Comment: Thank you for your patience with our Department's review of your rate increase submission.

Our Department has been working with the insurance companies on the rate increases which they are submitting to our Department.

The majority of the companies have been filing rate increases in excess of 10% on comprehensive major medical/medical expense coverage. Our Department is requesting that the companies consider no more than a 10% due to the impact that an increase would have on the insureds during this difficult economic time.

In lieu of the 20% increase which will be applicable to the new and inforce business for policy form HC-P-85, we are requesting that you implement a 10% rate increase. All other increases which you outlined due to health care reform are OK.

With respect to the 4.5% quarterly trend which you wish to implement on new and inforce business, this is to advise that it has been our Department's policy not to approve trend increases.

If you wish to accept the above changes, please provide us with a revised actuarial memorandum and rates.

Thank you for your understanding and cooperation.

Please feel free to contact me if you have questions.

Sincerely,

Rosalind Minor

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Response Letter

Response Letter Status Submitted to State
Response Letter Date 07/15/2010
Submitted Date 07/15/2010

Dear Rosalind Minor,

Comments:

Response 1

Comments: Please see attachments below.

Related Objection 1

Applies To:

- Health - Actuarial Justification (Supporting Document)

Comment:

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Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: Health - Actuarial Justification

Comment:

Satisfied -Name: Exhibits A - C

Comment:

Satisfied -Name: Response Letter

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,

Alison Serewko, Linda Rappaport, Rimma Kosubevsky

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Post Submission Update Request Processed On 07/16/2010

Status: Allowed
Created By: Alison Serewko
Processed By: Rosalind Minor
Comments:

Company Rate Information:

Company Name:The Guardian Life Insurance Company of America

Field Name	Requested Change	Prior Value
Overall % Indicated Change	11.100%	21.200%
Overall % Rate Impact	11.100%	21.300%
Written Premium Change for this Program	\$2032	\$3880

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Rate Information

Rate data applies to filing.

Filing Method: SERFF
Rate Change Type: Increase
Overall Percentage of Last Rate Revision: %
Effective Date of Last Rate Revision:
Filing Method of Last Filing:

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
The Guardian Life Insurance Company of America	11.100%	11.100%	\$2,032	3	\$18,303	%	%

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Supporting Document Schedules

		Item Status:	Status Date:
Satisfied - Item:	Cover letter	Approved-Closed	07/16/2010
Comments:			
Attachment:			
Cover Letter.pdf			

		Item Status:	Status Date:
Satisfied - Item:	Policy Rider	Approved-Closed	07/16/2010
Comments:			
Attachment:			
AR - IHC Policy Rider.pdf			

		Item Status:	Status Date:
Satisfied - Item:	Response Letter	Approved-Closed	07/16/2010
Comments:			
Attachment:			
Response Letter.pdf			



June 8, 2010

Rosalind Minor
Arkansas Insurance Department
1200 West Third Street
Little Rock, AR 72201
(501) 371-2600

Re: 10/1/2010 Medical Rate Filing for Individual Health Conversion Plans

**Carrier: The Guardian Life Insurance Company of America
NAIC# 64246**

Dear Rosalind Minor:

This memorandum has been prepared for the purpose of providing actuarial justification for The Guardian Life Insurance Company of America Health Conversion premium rates effective on or after October 1, 2010. This rate filing is for the group converted major medical expense policy Form HC-P-85. This memorandum may not be appropriate for other purposes.

We are filing for a 20% increase in premium effective on or after October 1, 2010, which will be applicable to new and inforce business for the policy form HC-P-85. Rates will increase on policyholder anniversaries.

In order to keep premium rates from lagging behind anticipated increases in medical claims costs, we are also filing for a 4.5% trend adjustment to the proposed premium rates effective in each subsequent quarter beginning on October 1, 2011. These quarterly rate increases will impact premium rates only on policyholder anniversaries. The current and proposed quarterly premium rates are shown in the attached Exhibit A.

We are also filing for a removal of lifetime benefit limit, extension of dependent child coverage to age 26, and coverage of preventive care benefits without cost sharing for plans issued on or after 1/1/2011. These revisions are being enacted in response to the Patient Protection and Affordable Care Act of 2010 (PPACA) ("Health Care Reform"). The rate impact of these changes, as described in the actuarial memo, is as follows:



Rate Impacts from Health Care Reform

	Rate Impact for Policies Issued Before 9/23/10	Rate Impact for Policies Issued After 9/23/10
Adult:	1.0%	1.9%
Children:	12.3%	13.3%
Overall:	1.0%	1.9%

Rate Impacts from Health Care Reform and Premium Increase (effective 10/1/10)

	Rate Impact for Policies Issued Before 9/23/10	Rate Impact for Policies Issued After 9/23/10
Adult:	21.2%	22.3%
Children:	34.8%	36.0%
Overall:	21.2%	22.3%

Please note that the load to the children rate has a 0% impact on our active AR policyholders because all 3 active members have no dependent coverage.

The current and proposed quarterly premium rates are shown in the attached Exhibit A.

The following items are included in this submission:

1. Actuarial Memorandum
2. Exhibit A – Rate Schedule
3. Exhibit B – Group converted major medical expense policy historical experience.
4. Exhibit C – Comparison of Anticipated Arkansas and Nationwide Loss Ratio with and without Rate Increase from 2010 to 2015
5. Policy Rider

If you have any questions, feel free to contact me at (212) 919-2563, or e-mail me at Jason_Robinson@glic.com.

Jason Robinson, ASA, MAAA

Actuarial Associate

June 8, 2010

Date

POLICY RIDER

This rider is hereby added to, and made part of this policy, to comply with the Federal Health Insurance Portability and Accountability Act of 1996.

This rider amends this policy so that we can't refuse to renew this policy solely because you reach Medicare age.

Also, we won't end your covered spouse's coverage under this policy solely because he or she has reached Medicare age.

All of the other terms and conditions of this policy remain unchanged. What we pay is based on all of the terms of this policy.

The Guardian Life Insurance Company of America

[Handwritten Signature]
SPECIALIST

Vice President, Group Underwriting



July 15, 2010

Rosalind Minor
Arkansas Insurance Department
1200 West Third Street
Little Rock, AR 72201
(501) 371-2600

**Re: 10/1/2010 Medical Rate Filing for Individual Health Conversion Plans
GARD-126665719**

**Carrier: The Guardian Life Insurance Company of America
NAIC# 64246**

Dear Rosalind Minor:

Guardian life insurance is revising its 10/1/2010 filing for individual health conversion plans in the following ways:

- 1) We are requesting a 10% increase in rates rather than 20%.
- 2) We are removing our request for quarterly trend.

Since we are still requesting a 1.0% increase due to health care reform, the overall rate change for this revised filing is 11.1%.

The following documents have been revised to accommodate these changes.

- 1) Actuarial Memorandum
- 2) Exhibit A – Rate sheets
- 3) Exhibit C – Projection of future loss ratios

If you have any questions, feel free to contact me at (212) 919-2563, or e-mail me at Jason_Robinson@glic.com.



Jason Robinson, ASA, MAAA
Actuarial Associate

July 15, 2010
Date