

American General Life Insurance Company

Actuarial Justification of Premium Rate Increase For Individual Long Term Care Policy Form Series 64028

1. PURPOSE OF FILING

This is a rate increase filing for American General Life Insurance Company's existing Long Term Care Policy Form Series 64028. The purpose of this filing is to demonstrate that the anticipated loss ratio for this form meets the minimum requirements of this state. This rate filing is not intended to be used for any other purposes.

2. SCOPE OF FILING

This filing applies to the Company's Long Term Care policy and rider forms summarized below:

Series LTC-1

Policy Form 64028-MD Non-Tax Qualified

Policy Form C12271-MD Tax Qualified

Rider Form 64031 (Inflation Benefit)

Rider Form 64032 (Nonforfeiture Benefit)

The rate increase will apply to all insureds issued coverage under the above referenced forms in this state. The number of policyholders and average premiums before and after the rate increase are shown in Exhibit A.

The rate increase will apply to in-force business only as the company stopped selling Policy Form Series 64028 in 2001.

3. REASON FOR RATE INCREASE REQUEST

This rate filing is a request for a 15% increase. While a rate increase larger than 15% can be justified at this time, the company is currently not seeking a higher increase. Instead the company will continue to monitor emerging experience and review whether an additional rate increase is necessary.

The product was originally priced for a 61% lifetime loss ratio. Exhibit B provides the originally filed loss ratios for this policy by duration. This filing demonstrates that if future experience is consistent with our best estimates, and nationwide earned premiums are restated to the historical Maryland rate level, the actual lifetime loss ratio will be 104.8%. The requested rate increase is needed to mitigate future losses.

The proposed effective date after approval and fulfillment of all statutory and contractual requirements will not be sooner than one year from the implementation date of the previous rate increase.

October 25, 2019

American General Life Insurance Company

Actuarial Justification of Premium Rate Increase
For Individual Long Term Care Policy Form Series 64028

4. RATE INCREASE HISTORY

There have been nine previous rate increases on the policies included in this filing:

Approval Date	Percentage Increase
7/27/2005	15%
2/20/2007	15%
8/19/2008	15%
10/27/2009	15%
11/29/2011	15%
1/15/2013	15%
2/28/2014	15%
2/2/2016	15%
5/4/2018	8%

5. PROJECTION ASSUMPTIONS

Interest – The effective annual rate of interest assumed for accumulating historical experience and for discounting projected future experience ranges from 4.9% to 6.5%.

Mortality – Mortality assumptions were developed separately for active lives and disabled lives. Active life mortality rates were developed as factors of the 2000 Annuity Table by attained age and policy duration. Active life mortality improvement is assumed for the first 30 years of the projection using the AA projection scale. Adjustment factors were developed based on actual experience and range from 0.53 for issue ages 64 and under to 0.60 for issue ages 88 and higher. Disabled life mortality is based on a percentage of claim termination rates.

Voluntary Lapse Rates - Current best estimate lapse assumptions by policy duration were derived from actual experience and displayed in the table below:

American General Life Insurance Company

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Voluntary Lapse Rates	
<u>Policy Year</u>	<u>Lapse Rates</u>
1	5.00%
2	4.90%
3	2.80%
4	2.10%
5	2.20%
6	2.10%
7	2.10%
8	2.90%
9	2.80%
10	2.90%
11	2.30%
12	2.10%
13	1.75%
14+	1.50%

Best estimate lapse assumptions are adjusted based on policy benefits. In general, lapse assumptions are lower for policies with higher benefits.

Morbidity - Morbidity assumptions are based on American General Life Insurance Company's actual experience. Expected claim costs are developed as the product of incidence, utilization and claim continuance and vary by the place of care (home care, assisted living facility, or nursing home). The morbidity assumptions do not include morbidity improvement.

6. MINIMUM REQUIRED LIFETIME LOSS RATIO

The minimum required lifetime loss ratio for these forms is 60%.

7. PROJECTED FUTURE EXPERIENCE

Future experience, which has been projected for forty years using the best estimate assumptions described in Section 5, is shown in Exhibit C. The following table summarizes the nationwide anticipated future loss ratio without the requested rate increase:

Nationwide Future Experience Best Estimate Assumptions Without Rate Increase		
Earned Premium at Historical Maryland Rate Level	Incurred Claims	Loss Ratio
\$99,771,744	\$339,813,100	340.6%

American General Life Insurance Company

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8. HISTORICAL EXPERIENCE

Nationwide experience from 4/1/1997 through 12/31/2018 is shown in Exhibit C. This data includes claim payments through 12/31/2018. The following table summarizes the nationwide historical loss ratio accumulated with interest to 12/31/2018:

Nationwide Historical Actual Experience		
Earned Premium at Historical Maryland Rate Level	Incurred Claims	Loss Ratio
\$823,763,763	\$628,081,939	76.2%

9. LIFETIME ANTICIPATED LOSS RATIO

The lifetime anticipated loss ratio is defined as the present value of the historical and projected future incurred claims divided by the present value of the historical and projected future earned premiums. Exhibit C also provides a projection of these values with a 15% rate increase implemented in calendar year 2019. Nationwide results are summarized below:

Anticipated Lifetime Loss Ratio Rate Increase = 15%			
Time Period	Earned Premium at Historical/Projected Maryland Rate Level	Incurred Claims	Loss Ratio
Future	\$111,310,889	\$339,813,100	305.3%
Lifetime	\$935,074,652	\$967,895,039	103.5%

The above demonstrates that both the anticipated future loss ratio and the lifetime anticipated loss ratio are in compliance with the minimum loss ratio requirements after implementation of the 15% rate increase.

American General Life Insurance Company

**Actuarial Justification of Premium Rate Increase
For Individual Long Term Care Policy Form Series 64028**

10. ACTUARIAL CERTIFICATION

I hereby certify to the best of my knowledge and judgment, the entire rate filing submitted herein is in compliance with all applicable laws of this state, the rules of the Department of Insurance, and Actuarial Standard of Practice Number 8 as adopted by the Actuarial Standards Board. In my opinion, the rates are not excessive or unfairly discriminatory. This filing will enhance premium adequacy, but it is likely that future rate action will be necessary. Therefore, benefits cannot be certified reasonable in relation to premium.

Respectfully submitted,



Brian D. Ulery, FSA, MAAA
Principal Consulting Actuary
LTCG

Attachments:

Exhibit A – Nationwide and Maryland Average Annualized Premiums
Exhibit B – Originally Filed Loss Ratios
Exhibit C – Lifetime Experience Without and With Rate Increase
Exhibit D – Rate Increase History and Filing Status
Exhibit E – Comparison of Actual and Expected Loss Ratios
Revised Rate Sheets (with 15% rate increase)
Policyholder Notification Letter

October 25, 2019

American General Life Insurance Company
Nationwide and Maryland Annualized Premiums
Policies Inforce as of 12/31/2018

		Average Annualized Premiums ¹	
		Annualized Premium Per Inforce	With a 15% Rate Increase
Nationwide	5,238	\$3,595	\$4,135
Maryland	146	\$4,725	\$5,434

¹ Based on premium paying policyholders

Exhibit B

American General Life Insurance Company
Policy Form Series 64028
Long Term Care Plan - 30 Year Projection
Original Filed Loss Ratios By Duration

Policy Year	Premiums	Claims	Loss Ratio	Present Values @ 5%		
				Premiums	Claims	Loss Ratio
1	1,646.00	357.87	21.7%	1,646.00	349.25	21.2%
2	1,174.80	352.43	30.0%	1,118.86	327.56	29.3%
3	881.09	348.16	39.5%	799.17	308.18	38.6%
4	710.18	337.80	47.6%	613.48	284.77	46.4%
5	597.83	325.02	54.4%	491.84	260.95	53.1%
6	512.55	315.77	61.6%	401.60	241.45	60.1%
7	442.14	319.93	72.4%	329.93	232.98	70.6%
8	383.65	323.33	84.3%	272.65	224.25	82.2%
9	334.78	326.36	97.5%	226.59	215.57	95.1%
10	290.39	316.20	108.9%	187.19	198.91	106.3%
11	250.59	302.63	120.8%	153.84	181.31	117.9%
12	217.55	296.93	136.5%	127.20	169.42	133.2%
13	187.75	287.79	153.3%	104.55	156.39	149.6%
14	161.02	275.73	171.2%	85.39	142.70	167.1%
15	137.20	261.28	190.4%	69.30	128.78	185.8%
16	116.34	245.33	210.9%	55.96	115.16	205.8%
17	98.10	232.24	236.7%	44.94	103.83	231.0%
18	82.21	217.65	264.7%	35.87	92.67	258.4%
19	68.41	201.91	295.1%	28.43	81.88	288.0%
20	56.50	185.40	328.1%	22.36	71.60	320.2%
21	46.38	168.79	363.9%	17.48	62.08	355.2%
22	37.81	151.94	401.9%	13.57	53.22	392.2%
23	30.57	135.31	442.6%	10.45	45.14	432.0%
24	24.48	119.13	486.6%	7.97	37.85	474.9%
25	19.40	103.60	534.0%	6.02	31.35	521.2%
26	15.25	89.21	585.0%	4.50	25.71	570.9%
27	11.87	75.26	634.0%	3.34	20.66	618.8%
28	9.15	62.71	685.4%	2.45	16.39	668.8%
29	6.99	51.56	737.6%	1.78	12.84	719.8%
30	5.27	41.79	793.0%	1.28	9.91	773.9%
Total	8,556.25	6,829.06	79.81%	6,883.98	4,202.77	61.05%

American General Life Insurance Company

Policy Form 64028

Lifetime Experience (Nationwide)

Earned Premiums at Historical Maryland Rate Level

Results With No Rate Increase				Results With Proposed Rate Increase		
<u>Year</u>	<u>Earned Premiums¹</u>	<u>Incurred Claims¹</u>	<u>Loss Ratio</u>	<u>Earned Premiums¹</u>	<u>Incurred Claims¹</u>	<u>Loss Ratio</u>
1997	114,262	0	0.0%	114,262	0	0.0%
1998	2,741,075	244,334	8.9%	2,741,075	244,334	8.9%
1999	8,897,299	1,637,372	18.4%	8,897,299	1,637,372	18.4%
2000	16,769,737	3,688,340	22.0%	16,769,737	3,688,340	22.0%
2001	25,249,863	10,077,782	39.9%	25,249,863	10,077,782	39.9%
2002	27,255,517	11,833,562	43.4%	27,255,517	11,833,562	43.4%
2003	25,899,360	12,475,984	48.2%	25,899,360	12,475,984	48.2%
2004	24,383,594	10,285,314	42.2%	24,383,594	10,285,314	42.2%
2005	23,440,001	16,233,786	69.3%	23,440,001	16,233,786	69.3%
2006	24,076,783	18,682,236	77.6%	24,076,783	18,682,236	77.6%
2007	22,449,156	18,593,464	82.8%	22,449,156	18,593,464	82.8%
2008	22,214,543	13,412,299	60.4%	22,214,543	13,412,299	60.4%
2009	23,231,625	21,836,537	94.0%	23,231,625	21,836,537	94.0%
2010	23,147,493	21,622,396	93.4%	23,147,493	21,622,396	93.4%
2011	21,645,060	21,544,323	99.5%	21,645,060	21,544,323	99.5%
2012	20,998,150	20,438,089	97.3%	20,998,150	20,438,089	97.3%
2013	21,753,313	32,526,531	149.5%	21,753,313	32,526,531	149.5%
2014	21,762,304	27,336,128	125.6%	21,762,304	27,336,128	125.6%
2015	21,234,522	33,347,373	157.0%	21,234,522	33,347,373	157.0%
2016	20,211,371	34,748,343	171.9%	20,211,371	34,748,343	171.9%
2017	18,789,008	30,374,556	161.7%	18,789,008	30,374,556	161.7%
2018	16,170,210	30,712,310	189.9%	16,170,210	30,712,310	189.9%
Accumulated ²	823,763,763	628,081,939	76.2%	823,763,763	628,081,939	76.2%
2019	17,695,133	35,693,368	201.7%	17,695,133	35,693,368	201.7%
2020	15,860,700	35,913,712	226.4%	17,319,884	35,913,712	207.4%
2021	14,122,353	35,667,834	252.6%	16,240,706	35,667,834	219.6%
2022	12,515,559	35,092,736	280.4%	14,392,892	35,092,736	243.8%
2023	11,041,044	34,294,986	310.6%	12,697,201	34,294,986	270.1%
2024	9,687,131	33,385,602	344.6%	11,140,201	33,385,602	299.7%
2025	8,450,472	32,208,911	381.1%	9,718,043	32,208,911	331.4%
2026	7,329,510	30,693,679	418.8%	8,428,937	30,693,679	364.1%
2027	6,316,569	28,972,706	458.7%	7,264,054	28,972,706	398.9%
2028	5,409,757	27,152,837	501.9%	6,221,220	27,152,837	436.5%
2029	4,601,887	25,240,430	548.5%	5,292,170	25,240,430	476.9%

American General Life Insurance Company

Policy Form 64028

Lifetime Experience (Nationwide)

Earned Premiums at Historical Maryland Rate Level

Results With No Rate Increase				Results With Proposed Rate Increase		
Year	Earned Premiums ¹	Incurred Claims ¹	Loss Ratio	Earned Premiums ¹	Incurred Claims ¹	Loss Ratio
2030	3,890,786	23,148,923	595.0%	4,474,404	23,148,923	517.4%
2031	3,267,694	20,911,690	640.0%	3,757,848	20,911,690	556.5%
2032	2,726,763	18,658,277	684.3%	3,135,778	18,658,277	595.0%
2033	2,260,855	16,478,178	728.8%	2,599,983	16,478,178	633.8%
2034	1,862,068	14,495,950	778.5%	2,141,378	14,495,950	676.9%
2035	1,524,051	12,656,084	830.4%	1,752,659	12,656,084	722.1%
2036	1,239,215	10,947,682	883.4%	1,425,098	10,947,682	768.2%
2037	1,001,207	9,371,074	936.0%	1,151,388	9,371,074	813.9%
2038	803,830	7,946,698	988.6%	924,404	7,946,698	859.7%
2039	641,114	6,724,728	1048.9%	737,281	6,724,728	912.1%
2040	508,310	5,658,501	1113.2%	584,557	5,658,501	968.0%
2041	400,463	4,733,748	1182.1%	460,532	4,733,748	1027.9%
2042	313,487	3,935,069	1255.3%	360,511	3,935,069	1091.5%
2043	243,903	3,244,671	1330.3%	280,489	3,244,671	1156.8%
2044	188,507	2,669,746	1416.3%	216,783	2,669,746	1231.5%
2045	144,910	2,177,018	1502.3%	166,647	2,177,018	1306.4%
2046	110,670	1,766,108	1595.8%	127,270	1,766,108	1387.7%
2047	83,941	1,431,342	1705.2%	96,533	1,431,342	1482.8%
2048	63,298	1,153,617	1822.5%	72,793	1,153,617	1584.8%
2049	47,223	924,425	1957.6%	54,307	924,425	1702.2%
2050	35,061	734,694	2095.5%	40,320	734,694	1822.2%
2051	25,881	583,050	2252.8%	29,764	583,050	1958.9%
2052	18,919	460,062	2431.7%	21,757	460,062	2114.6%
2053	13,741	358,125	2606.3%	15,802	358,125	2266.3%
2054	9,829	275,331	2801.1%	11,304	275,331	2435.7%
2055	6,974	209,403	3002.5%	8,020	209,403	2610.9%
2056	4,906	157,991	3220.5%	5,642	157,991	2800.4%
2057	3,439	119,518	3475.3%	3,955	119,518	3022.0%
2058	2,355	88,950	3776.5%	2,709	88,950	3283.9%
Present Value ²	99,771,744	339,813,100	340.6%	111,310,889	339,813,100	305.3%
Lifetime ²	923,535,508	967,895,039	104.8%	935,074,652	967,895,039	103.5%

¹ Projected future earned premiums and incurred claims are based on best estimate persistency and morbidity assumptions as shown in Section 5 of the actuarial memorandum.

² The interest rate used to accumulate the historical and future totals varies for each year. It ranges from 4.9% to 6.5%.

**American General Life Insurance Company
LTC Rate History and Filing Status
Policy 64028 and Associated Riders**

**Exhibit D
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			Rate Increase #1			Rate Increase #2			Rate Increase #3			Rate Increase #4			Rate Increase #5		
State	Inforce Lives as of 12/2018	Annualized Premium as of 12/2018	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status
Alabama	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-
Alaska	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-
Arizona	49	168,483	25.00%	15.00%	9/9/2005	25.00%	15.00%	7/31/2007	25.00%	15.00%	12/29/2008	25.00%	25.00%	5/17/2010	25.00%	25.00%	1/23/2012
Arkansas	2	13,848	25.00%	25.00%	11/6/2006	25.00%	25.00%	10/1/2008	25.00%	12.50%	3/3/2010	25.00%	10.00%	4/19/2013	25.00%	15.00%	6/24/2015
California	630	1,893,244	25.00%	25.00%	1/14/2005	25.00%	25.00%	6/26/2007	25.00%	25.00%	5/11/2010	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Colorado	39	122,110	25.00%	25.00%	7/19/2006	25.00%	25.00%	10/7/2008	25.00%	25.00%	1/12/2010	25.00%	25.00%	7/15/2015	25.00%	0.00%	to be filed
Connecticut	57	314,312	25.00%	25.00%	5/25/2006	25.00%	15.00%	8/5/2008	25.00%	10.00%	11/6/2009	25.00%	20.00%	11/19/2010	25.00%	15.00%	7/12/2012
DC	4	9,827	25.00%	21.00%	10/8/2008	25.00%	10.00%	3/3/2011	25.00%	10.00%	5/30/2012	25.00%	10.00%	11/8/2013	10.00%	10.00%	2/18/2015
Delaware	31	69,334	25.00%	10.00%	4/5/2006	25.00%	10.00%	10/20/2008	25.00%	15.00%	5/10/2010	25.00%	15.00%	8/10/2011	25.00%	25.00%	10/22/2013
Florida	143	324,718	23.00%	23.00%	10/30/2006	64.00%	11.70%	10/24/2014	46.30%	46.30%	10/2/2017	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Georgia	10	28,363	25.00%	12.00%	9/26/2005	25.00%	10.00%	3/6/2007	25.00%	10.00%	11/11/2008	25.00%	10.00%	3/30/2010	25.00%	15.00%	7/18/2011
Hawaii	6	21,299	25.00%	20.00%	8/29/2006	25.00%	20.00%	12/24/2008	25.00%	15.00%	6/6/2011	25.00%	25.00%	8/12/2014	25.00%	20.60%	6/19/2018
Idaho	34	72,939	25.00%	25.00%	6/8/2006	25.00%	25.00%	10/7/2008	25.00%	25.00%	4/29/2010	25.00%	10.00%	1/6/2012	25.00%	10.00%	10/30/2014
Illinois	217	973,002	25.00%	25.00%	2/4/2005	25.00%	25.00%	6/20/2007	25.00%	25.00%	8/4/2008	25.00%	25.00%	12/4/2009	25.00%	25.00%	3/29/2011
Indiana	29	72,218	25.00%	25.00%	9/24/2005	25.00%	25.00%	2/20/2007	25.00%	25.00%	11/6/2008	25.00%	10.00%	6/24/2010	25.00%	0.00%	to be filed
Iowa	48	138,471	25.00%	20.00%	6/2/2006	25.00%	15.00%	11/24/2008	25.00%	20.00%	5/7/2010	25.00%	19.00%	7/6/2011	25.00%	18.00%	11/5/2012
Kansas	141	430,790	25.00%	15.00%	8/11/2005	25.00%	15.00%	6/1/2007	25.00%	25.00%	11/10/2008	25.00%	10.00%	7/26/2010	25.00%	10.00%	9/28/2011
Kentucky	30	100,341	25.00%	25.00%	7/15/2005	25.00%	25.00%	2/19/2007	25.00%	10.00%	1/6/2009	25.00%	10.00%	5/17/2010	25.00%	5%/20%	9/7/2011
Louisiana	39	89,430	25.00%	25.00%	2/9/2007	25.00%	10.00%	8/21/2008	25.00%	15.00%	5/21/2010	15.00%	15.00%	8/23/2013	25.00%	20.00%	5/31/2016
Maine	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-
Maryland	146	689,852	15.00%	15.00%	7/27/2005	15.00%	15.00%	2/20/2007	15.00%	15.00%	8/19/2008	15.00%	15.00%	10/27/2009	15.00%	15.00%	11/29/2011
Massachusetts	337	960,095	25.00%	25.00%	11/23/2005	25.00%	10.00%	5/17/2012	151.00%	40.00%	1/20/2017	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Michigan	61	308,693	25.00%	25.00%	3/17/2005	25.00%	25.00%	2/28/2007	25.00%	25.00%	9/18/2008	25.00%	25.00%	11/2/2009	25.00%	25.00%	12/14/2010
Minnesota	121	303,916	25.00%	25.00%	3/15/2005	25.00%	25.00%	4/12/2007	25.00%	25.00%	2/10/2009	25.00%	25.00%	4/24/2018	25.00%	0.00%	to be filed
Mississippi	11	44,428	25.00%	25.00%	10/24/2008	25.00%	25.00%	3/26/2010	25.00%	25.00%	7/25/2011	25.00%	25.00%	3/8/2013	25.00%	25.00%	5/22/2014
Missouri	95	364,204	25.00%	25.00%	6/12/2006	25.00%	25.00%	10/31/2007	25.00%	25.00%	11/14/2008	25.00%	26.50%	8/22/2012	25.00%	25.00%	3/18/2015
Montana	10	23,679	25.00%	25.00%	3/2/2006	25.00%	25.00%	9/16/2008	25.00%	25.00%	11/12/2009	25.00%	25.00%	12/20/2010	25.00%	15.00%	1/23/2012
Nebraska	23	82,672	25.00%	25.00%	4/1/2005	25.00%	25.00%	1/5/2009	25.00%	25.00%	3/30/2010	25.00%	10.00%	10/14/2011	25.00%	25.00%	3/21/2013
Nevada	14	48,387	25.00%	25.00%	10/15/2008	25.00%	25.00%	1/27/2010	25.00%	20.00%	4/16/2013	25.00%	25.00%	4/29/2015	25.00%	25.00%	4/23/2018
New Hampshire	32	79,801	25.00%	25.00%	7/14/2006	25.00%	25.00%	7/17/2008	25.00%	25.00%	10/1/2009	25.00%	25.00%	8/10/2012	25.00%	25.00%	3/17/2015
New Jersey	341	1,690,184	25.00%	20%/10%	12/12/2006	25.00%	25.00%	10/31/2008	25.00%	25.00%	7/12/2010	25.00%	25.00%	11/21/2012	25.00%	25.00%	3/19/2014
New Mexico	47	135,140	25.00%	25.00%	4/4/2005	25.00%	25.00%	3/8/2007	25.00%	25.20%	10/2/2009	25.00%	10.00%	12/21/2012	25.00%	15.00%	2/25/2014
New York	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-
North Carolina	109	374,575	25.00%	25.00%	12/9/2005	25.00%	25.00%	9/11/2008	25.00%	25.00%	11/17/2009	25.00%	13.50%	7/23/2013	25.00%	10.00%	1/21/2015
North Dakota	59	245,872	15.00%	20.00%	3/15/2005	25.00%	20.00%	3/1/2007	25.00%	20.00%	10/21/2008	25.00%	20.00%	1/5/2010	25.00%	20.00%	11/23/2010
Ohio	192	628,716	25.00%	25.00%	1/21/2005	25.00%	25.00%	2/15/2007	25.00%	25.00%	9/10/2008	25.00%	10.00%	4/9/2010	25.00%	25.00%	12/2/2015
Oklahoma	145	419,110	15.00%	15.00%	12/27/2004	15.00%	15.00%	2/2/2007	15.00%	15.00%	2/6/2009	15.00%	10.00%	11/8/2010	15.00%	15.00%	12/20/2011
Oregon	87	255,655	25.00%	20.00%	4/30/2007	25.00%	15.00%	10/10/2008	25.00%	5.00%	5/20/2010	25.00%	10.00%	12/9/2011	25.00%	15.00%	12/16/2013
Pennsylvania	303	1,190,650	25.00%	25.00%	6/2/2005	25.00%	10.00%	9/19/2007	25.00%	25.00%	9/8/2008	25.00%	17.50%	5/6/2010	25.00%	17.50%	6/8/2012
Rhode Island	93	294,156	25.00%	25.00%	4/4/2005	25.00%	25.00%	4/5/2007	25.00%	15.40%	8/17/2009	25.00%	16.70%	9/19/2011	25.00%	25.00%	4/28/2015
South Carolina	36	138,237	25.00%	25.00%	5/9/2006	25.00%	25.00%	4/25/2007	25.00%	20.00%	11/25/2008	25.00%	20.00%	7/22/2010	25.00%	5.00%	11/3/2011
South Dakota	23	119,213	25.00%	25.00%	6/24/2005	25.00%	25.00%	7/11/2008	25.00%	25.00%	8/27/2009	25.00%	11.00%	10/21/2010	25.00%	25.00%	2/10/2012
Tennessee	32	115,320	25.00%	25.00%	6/16/2006	25.00%	15.00%	9/22/2008	25.00%	18.00%	11/18/2009	25.00%	10.00%	2/17/2011	25.00%	25.00%	3/15/2012
Texas	348	956,724	25.00%	25.00%	8/1/2005	25.00%	18.00%	4/25/2007	25.00%	16.00%	6/29/2009	25.00%	25.00%	6/10/2011	25.00%	18.00%	7/28/2014
Utah	21	50,814	25.00%	25.00%	8/10/2006	25.00%	25.00%	7/6/2009	25.00%	25.00%	10/25/2010	25.00%	25.00%	3/30/2012	25.00%	25.00%	1/10/2017
Vermont	6	13,481	25.00%	0.00%	disapproved	0.00%	0.00%	not filing	0.00%	0.00%	not filing	0.00%	0.00%	not filing	0.00%	0.00%	not filing
Virginia	79	333,265	25.00%	25.00%	7/25/2006	25.00%	25.00%	10/1/2008	25.00%	25.00%	5/29/2011	25.00%	12.60%	3/14/2013	25.00%	25.00%	11/6/2015
Washington	52	326,620	25.00%	25.00%	2/1/2005	25.00%	25.00%	2/21/2007	25.00%	25.00%	9/2/2008	25.00%	25.00%	11/23/2009	25.00%	25.00%	5/2/2011
West Virginia	9	42,865	25.00%	15.00%	6/14/2006	25.00%	25.00%	12/10/2008	25.00%	25.00%	5/13/2010	25.00%	25.00%	9/28/2011	25.00%	15.00%	3/25/2013
Wisconsin	897	2,592,723	25.00%	20.00%	10/21/2005	25.00%	12.00%	11/1/2007	25.00%	16%/10%	8/25/2009	25.00%	25%/10%	8/4/2011	25.00%	25%/10%	11/18/2013
Wyoming	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-

**American General Life Insurance Company
LTC Rate History and Filing Status
Policy 64028 and Associated Riders**

**Exhibit D
Page 2 of 2**

			Rate Increase #6			Rate Increase #7			Rate Increase #8			Rate Increase #9			Rate Increase #10		
State	Inforce Lives as of 12/2018	Annualized Premium as of 12/2018	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status	Rate Incrs Requested	Rt Incrs Approved	Approved Date/Current Status
Alabama	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-
Alaska	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-
Arizona	49	168,483	25.00%	0.00%	pending	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Arkansas	2	13,848	25.00%	25.00%	11/7/2016	25.00%	25.00%	6/15/2018	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
California	630	1,893,244	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Colorado	39	122,110	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Connecticut	57	314,312	25.00%	20.00%	6/18/2013	19.00%	19.00%	9/3/2015	25.00%	40.00%	3/27/2018	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
DC	4	9,827	0.00%	0.00%	not filing	0.00%	0.00%	not filing	0.00%	0.00%	not filing	0.00%	0.00%	not filing	0.00%	0.00%	not filing
Delaware	31	69,334	25.00%	25.00%	5/20/2015	25.00%	25.00%	11/16/2017	25.00%	25.00%	10/15/2019	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Florida	143	324,718	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Georgia	10	28,363	25.00%	12.00%	7/20/2012	25.00%	10.00%	8/13/2013	25.00%	10.00%	7/29/2015	25.00%	12.00%	7/26/2017	25.00%	10.00%	8/5/2019
Hawaii	6	21,299	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Idaho	34	72,939	42.20%	21.00%	7/31/2018	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Illinois	217	973,002	25.00%	25.00%	3/27/2012	25.00%	25.00%	1/8/2015	27.00%	27.00%	10/30/2017	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Indiana	29	72,218	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Iowa	48	138,471	25.00%	16.50%	12/27/2013	25.00%	17.90%	10/14/2015	25.00%	17.90%	3/6/2019	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Kansas	141	430,790	25.00%	12.00%	10/23/2012	25.00%	10.00%	9/24/2013	25.00%	10.00%	3/18/2016	25.00%	15.00%	3/12/2019	25.00%	0.00%	to be filed
Kentucky	30	100,341	25.00%	5%/15%/25%	9/23/2014	25.00%	15.00%	2/1/2016	25.00%	25.00%	3/14/2019	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Louisiana	39	89,430	25.00%	20.00%	9/30/2019	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Maine	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-
Maryland	146	689,852	15.00%	15.00%	1/15/2013	15.00%	15.00%	2/28/2014	15.00%	15.00%	2/2/2016	15.00%	8.00%	5/4/2018	15.00%	0.00%	pending
Massachusetts	337	960,095	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Michigan	61	308,693	25.00%	25.00%	1/25/2012	25.00%	25.00%	7/15/2013	11.00%	11.00%	7/29/2015	10.00%	10.00%	12/27/2017	10.00%	0.00%	to be filed
Minnesota	121	303,916	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Mississippi	11	44,428	25.00%	10.00%	1/21/2016	25.00%	0.00%	pending	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Missouri	95	364,204	25.00%	25.00%	8/2/2016	25.00%	25.00%	9/26/2018	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Montana	10	23,679	25.00%	25.00%	8/20/2013	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Nebraska	23	82,672	25.00%	25.00%	10/17/2014	25.00%	33.10%	10/27/2016	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Nevada	14	48,387	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
New Hampshire	32	79,801	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
New Jersey	341	1,690,184	25.00%	33.10%	3/17/2017	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
New Mexico	47	135,140	25.00%	15.00%	10/23/2015	25.00%	15.00%	7/5/2018	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
New York	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-
North Carolina	109	374,575	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
North Dakota	59	245,870	25.00%	20.00%	2/13/2012	25.00%	15.00%	7/18/2013	25.00%	15.00%	7/24/2015	25.00%	15.00%	10/25/2017	25.00%	15.00%	5/23/2019
Ohio	192	628,716	25.00%	15.00%	3/6/2018	25.00%	0.00%	pending	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Oklahoma	145	419,110	25.00%	25.00%	3/27/2013	25.00%	25.00%	10/28/2014	25.00%	10.00%	5/31/2016	25.00%	15.00%	4/5/2019	25.00%	0.00%	to be filed
Oregon	87	255,655	25.00%	70.00%	12/14/2015	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Pennsylvania	303	1,190,650	25.00%	15.00%	10/7/2014	25.00%	16.00%	6/11/2019	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Rhode Island	93	294,156	25.00%	0.00%	pending	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
South Carolina	36	138,237	25.00%	15.00%	3/1/2013	25.00%	9.50%	9/12/2014	25.00%	8.00%	3/23/2016	25.00%	0.00%	pending	25.00%	0.00%	to be filed
South Dakota	23	119,213	25.00%	25.00%	8/13/2013	25.00%	25.00%	9/9/2015	25.00%	25.00%	10/17/2018	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Tennessee	32	115,320	25.00%	25.00%	7/23/2013	25.00%	25.00%	2/20/2015	25.00%	15.00%	8/17/2017	25.00%	15.00%	9/10/2019	25.00%	0.00%	to be filed
Texas	348	956,724	25.00%	25.00%	3/6/2019	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Utah	21	50,814	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Vermont	6	13,481	0.00%	0.00%	not filing	0.00%	0.00%	not filing	0.00%	0.00%	not filing	0.00%	0.00%	not filing	0.00%	0.00%	not filing
Virginia	79	333,265	25.00%	0.00%	pending	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Washington	52	326,620	25.00%	25.00%	7/6/2012	25.00%	25.00%	11/22/2013	25.00%	25.00%	9/30/2015	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
West Virginia	9	42,865	25.00%	25.00%	3/23/2015	25.00%	25.00%	3/31/2017	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Wisconsin	897	2,592,723	25.00%	25%/10%	1/12/2016	25.00%	12%/10%	3/19/2018	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed	25.00%	0.00%	to be filed
Wyoming	0	0	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-	0.00%	0.00%	-

American General Life Insurance Company
Policy Form Series 64028
Historical Experience
Comparison of Actual and Expected Loss Ratios

Year	Lives	Earned Premiums	Paid Claims	Claim Reserves	Actual Incurred Claims	Actual Loss Ratio	Expected Earned Premiums	Expected Incurred Claims	Expected Loss Ratio	Actual/ Expected Loss Ratio
1997	260	114,262	-	-	-	0.0%	132,540	28,545	21.5%	-
1998	2,544	2,741,075	244,334	-	244,334	8.9%	2,680,314	639,588	23.9%	0.37
1999	6,226	8,897,299	1,637,372	-	1,637,372	18.4%	8,369,050	2,139,571	25.6%	0.72
2000	9,974	16,769,737	3,688,340	-	3,688,340	22.0%	14,286,221	3,924,239	27.5%	0.80
2001	13,834	25,249,863	10,077,782	-	10,077,782	39.9%	19,313,345	5,672,883	29.4%	1.36
2002	13,257	27,255,517	11,833,562	-	11,833,562	43.4%	18,795,472	6,409,163	34.1%	1.27
2003	12,675	25,899,360	12,264,824	211,159	12,475,984	48.2%	15,129,831	6,383,664	42.2%	1.14
2004	12,279	24,383,594	10,232,168	53,146	10,285,314	42.2%	12,781,385	6,428,242	50.3%	0.84
2005	11,714	23,464,347	15,864,435	369,351	16,233,786	69.2%	11,036,312	6,496,563	58.9%	1.18
2006	11,190	23,654,567	18,242,104	440,131	18,682,236	79.0%	9,635,137	6,611,223	68.6%	1.15
2007	10,705	23,429,392	17,627,877	965,587	18,593,464	79.4%	8,487,856	6,732,172	79.3%	1.00
2008	10,099	22,849,710	13,354,084	58,215	13,412,299	58.7%	7,507,132	6,795,322	90.5%	0.65
2009	9,367	22,762,416	20,041,965	1,794,573	21,836,537	95.9%	6,652,669	6,805,152	102.3%	0.94
2010	8,808	22,350,672	21,123,732	498,664	21,622,396	96.7%	5,893,448	6,747,233	114.5%	0.85
2011	8,317	22,106,283	19,720,506	1,823,817	21,544,323	97.5%	5,217,212	6,653,536	127.5%	0.76
2012	7,841	21,057,719	18,089,514	2,348,575	20,438,089	97.1%	4,617,020	6,550,573	141.9%	0.68
2013	7,351	20,400,670	24,835,347	7,691,184	32,526,531	159.4%	4,075,018	6,424,577	157.7%	1.01
2014	6,903	19,452,068	20,837,500	6,498,628	27,336,128	140.5%	3,582,573	6,267,587	174.9%	0.80
2015	6,488	18,320,842	20,293,166	13,054,207	33,347,373	182.0%	3,136,967	6,082,215	193.9%	0.94
2016	6,050	17,573,725	16,428,547	18,319,796	34,748,343	197.7%	2,733,995	5,866,997	214.6%	0.92
2017	5,599	15,817,392	8,147,000	22,227,557	30,374,556	192.0%	2,372,306	5,626,802	237.2%	0.81
2018	5,269	14,737,244	1,587,286	29,125,024	30,712,310	208.4%	2,049,130	5,362,047	261.7%	0.80
Subtotal		419,287,754	286,171,444	105,479,615	391,651,059	93.4%	168,484,932	120,647,895	71.6%	1.30
Accumulated*		808,623,836	503,688,454	124,393,485	628,081,939	77.7%	381,619,786	223,303,085	58.5%	1.33

*The interest rate used to accumulate the historical totals varies for each year. It ranges from 4.9% to 6.5%.