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Actuarial Memorandum
Policy Forms (Certificates):

Previously filed under Life Investors Insurance Company of America(“LIICA”):
GP001 796 (GC001-NH (MD) 796, GC001-LTC (MD) 796, GC001-HCC (MD) 796) As NEA Group Long Term Care Coverage

Applicable to All Policies (and Certificates as Applicable) Regardless of Application or Issue Date

1) Scope and Purpose

This filing is a request for a premium rate increase of 108% on the above-captioned policy forms (and certificates as applicable) and all associated riders regardless of application or issue date. The increase for any given policy or certificate holder would not become effective until all statutory requirements are satisfied, and if applicable, a period of one year has elapsed since the effective date of the previously approved rate increase. Even though the traditional NAIC method of determining premium rate increases indicates that the Company could request an increase of 536.4%, the Company has chosen to base its increase request on the “Blended If-Knew/Make-up” justification formula, also known as, “The Minnesota Method.” The Minnesota Method is a hybrid of the traditional NAIC increase formula where the resulting justifiable increase is constrained to a lesser amount.

This premium rate increase is needed due to claim levels that produce lifetime loss ratios above the statutorily required minimum loss ratio. If the requested rate increase is approved and implemented as proposed, the company does not expect to request additional rate increases based on current expectations of future experience. However, if actual future experience were to deteriorate further, additional rate action may become necessary even if the requested rate increase is approved and implemented as proposed.

The purpose of this memorandum is to file revised premium rates in this state and demonstrate that the anticipated loss ratio meets the minimum requirements of this state. This memorandum is not to be used for other purposes.

Benefit Reduction and Cost Sharing Option (with Rate Guarantee)

The Company would also like to make available to all policyholders a Benefit Reduction and Cost Sharing option to help the customer avoid some or all of the cost of the premium rate increase and receive a premium rate guarantee for a set number of years as outlined in Appendix A. The Company is filing a Benefit Reduction and Cost Sharing Endorsement that will be issued to the policyholder if they choose this option.

The Benefit Reduction and Cost Sharing option affects both:

1) The policy/certificate benefit limits available under the policy/certificate (by reducing all of the policy benefit limits available by the Cost Sharing Percentage), and
2) Amounts that the policyholder/certificate holder and the Company are responsible for with respect to each claim (by reducing the amounts that the Company will pay for claims by the Cost Sharing Percentage). If inflation protection coverage is included in the policy/certificate, all future benefit amount increases will be based on the new revised benefit amounts. The Benefit Reduction and Cost Sharing option also applies to all policy/certificate benefit provisions, including any benefit provision added by rider or endorsement. The Benefit Reduction and Cost Sharing option also applies to benefits for covered care or services received by another covered person who is covered under the policy/certificate.

Benefit Reduction and Cost Sharing percentages were determined to be actuarially equivalent to the requested rate increase – which includes the cost of the Rate Guarantee. Policyholders and certificate holders selecting the Benefit Reduction and Cost Sharing option will generally be able to completely or partially offset the requested rate increase and receive the Rate Guarantee. Some policyholders or certificate holders electing the Benefit Reduction and Cost Sharing option may not be able to completely offset the requested rate increase but would be able to mitigate it. The Benefit Reduction and Cost Sharing percentages are shown in Appendix A.

Policyholders who elect the Benefit Reduction and Cost Sharing Option may still be subject to future rate increases after the Rate Guarantee period has expired if additional rate increases become justified due to further deterioration of experience not currently anticipated.

Buyback Offer

This filing is also a request to allow the Company to offer policyholders the option to cancel their long-term care insurance policy in exchange for a one-time, lump-sum, policy cancellation payment in an amount to be determined based on the formula set forth below. The policyholder will be given the option to cancel their policy as an alternative to the premium increase.

The policy cancellation payment amount will be the greater of:

- x% of Transamerica's estimate of the value of the policy, and
- $2,000

The Buyback will be offered to both premium paying policies as well as active paid-up policies that are not in Contingent Non-Forfeiture status.

More details about the buyback offer are displayed in Appendix B.

2) Benefits *

NEA Group Series

A. *Nursing Home*
Pays actual charges up to the Nursing Home Daily Benefit for each day benefits are payable. Benefits are payable up to the Maximum Nursing Home Lifetime Benefit.

B. *Home and Community Care - Certificate forms: GC001-HHC (MD) 796 & GC001-LTC (MD) 796*
Pays actual charges up to the Home and Community Care Maximum Daily Benefit. Benefits include Home Health, Adult Day Care, Respite Care, Equipment Purchases and Rentals, Assisted Living Facility, Bed Reservation, Ambulance, Hospice Facility, Home Hospice, Chore Services, and Emergency Response. Benefits are payable up to the Maximum Home and Community Care Lifetime Benefit.

C. *Simple Benefit Increase Option (BIO)*
Increases benefits by 5% of the original amount on each anniversary of the policy.

D. *Compound Benefit Increase Option (BIO)*
Increases benefits by 5% of the current amount on each certificate anniversary.

3) Renewability

These contract forms are guaranteed renewable for life, subject to the company's right to change premium rates.

* This is not intended to be a comprehensive listing of all benefits available.

4) **Applicability**

This filing applies to inforce insureds only, as these forms are no longer actively being sold. The premium change will be applicable to the base forms and to all certificates and riders associated with the base forms.

5) **Morbidity**

Morbidity assumptions are developed using internal company experience looking across multiple variables. The assumptions for incidence, recovery, on-claim mortality, utilization, and transition generally vary on variables such as marital status, gender, implied elimination period, benefit period, benefit package, policy inflation option, issue age, attained age, issue year, and calendar year.

6) **Off-Claim Mortality**

Off-claim, or active life, mortality assumptions are developed using internal company experience and vary based on attained age, issue year, gender and marital status. The rates are further adjusted by improvement factors for the lessor of 35 years or the number of years to age 100 that vary by gender and attained age.

7) **Persistency**

Voluntary lapse rates are based on Company experience and vary by duration, issue age, marital status, service group, and policy inflation option.

8) **Expenses**

Expenses have not been explicitly projected. It is assumed the originally filed expense assumptions remain appropriate.

9) **Marketing**

These policy forms were marketed by agents to individuals in age ranges that vary by policy form.

10) **Policy Design**

Policy design features have been taken into consideration. Benefit provisions, exclusions, elimination periods, benefit periods, number of units, benefit growth, etc. have been accounted for either in the development of claim costs or projection model formulas.

11) **Underwriting**

These policy forms were fully underwritten with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician’s statement, telephone interview and/or face-to-face assessment.

12) **Claims Adjudication Practice**

No significant changes to the standard operating practices of the Claims Department have been necessary to date nor are any changes expected to be necessary in the future. The claims adjudication staff has maintained a consistently high degree of expertise, experience, and performance over the life of these policy forms and this is expected to continue in the future. Therefore, special adjustments due to claims adjudication practice have not been incorporated into the projection.

13) Premiums

Premiums vary based on original issue age, rate class, and benefit options selected.

14) Issue Age Range

For the NEA Group Series, applicants age 18–79 were eligible for all elimination periods and benefit periods. Applicants age 80-84 were eligible for the 100-day elimination period and the 1-year, 2-year, 3-year and 4-year benefit periods only. Applicants age 85 and older were eligible for the 100-day elimination period and the 1-year and 2-year benefit periods only.

15) Area Factors

Area factors are not used for these products.

16) Average Annual Premium

Series	Before Increase	After Increase
NEA Group	$2,931	$6,097

17) Premium Modalization Rules

Modal factors, which are applied to the annual premium, are no greater than the following:

Premium Mode	Annual	Semi-annual	Quarterly	Monthly
NEA Group Series	1.000	0.500	0.250	0.083

18) Claim Liability and Reserve

The present value of amounts not yet due (Exhibit 6) is calculated for all open claims using termination rates derived from company experience. The resulting reserve is adjusted by factors based on age at incurral, sex, and benefit period developed from company experience. The interest rate varies by year of incurral. The incurred but not reported and in course of settlement reserves (Exhibit 8) are calculated based on the development of incurred claims by month of incurral, based on internal Company data. The claim reserves underlying the incurred claims in the projection are consistent with the reserves reported in Exhibits 6 and 8 of the Company's financial statement.

19) Active Life Reserve

Active life reserves may have been used in the original pricing of the captioned forms to demonstrate compliance with the minimum 60% loss ratio. However, active life reserves have not been used in this premium rate increase filing to demonstrate compliance with the 60% loss ratio requirement. As a result, we are requesting a lesser increase than would have been necessary had we included the cost of the active life reserves.

20) Trend Assumptions

As this is not medical insurance, we have not included any explicit medical cost trends in the projections.

21) Minimum Required Loss Ratio

The Statutorily Required Minimum Loss Ratio for these forms is 60%.

22) Anticipated Loss Ratio

The anticipated lifetime loss ratio for this block of business is shown in Exhibit I.

23) Distribution of Business

See Attachment A.

24) Contingency and Risk Margins

Contingency and risk margins have not been included in the justification for this rate increase.

25) Experience on the Form

See Exhibit I for nationwide calendar year historical experience through September 30, 2022, as well as projected experience thereafter both with and without the proposed rate increase. See Exhibit II for nationwide policy year actual-to-expected experience where 'actual' experience includes historical experience through September 30, 2022, combined with current-assumption projected experience thereafter. Nationwide earned premium has been adjusted to reflect the timing and magnitude of approved rate increase history of this state. Historical incurred claims in all exhibits reflect claim payment runoff through December 31, 2022, plus the claim reserve estimate as of December 31, 2022 (as described in Section 16 above).

26) History of Rate Adjustments

The magnitude of rate increases approved for each product discussed herein is displayed in Attachment B.

27) Number of Insureds

As of December 31, 2022, the number of insureds that will be affected by this increase is:

	Insureds	Annualized Premium
Maryland:		
Subject to Increase	394	$1,159,129
Buyback Only (Paid Up)	1	
Nationwide:		
Subject to Increase	6,294	$18,449,813
Buyback Only (Paid Up)	1,138	

28) Proposed Effective Date

The proposed rate increase will be implemented following approval, after fulfillment of all statutory and contractual requirements. The increase for any insured will not become effective until a period of one year has elapsed since the previously approved rate increase effective date, if applicable.

29) Actuarial Certification

I certify that to the best of my knowledge and judgment, the entire rate filing is in compliance with the applicable laws of this state and with the rules of the Department of Insurance, and complies with all applicable Actuarial Standards of Practice including Actuarial Standard of Practice No 8. I certify that benefits are reasonable in relation to premium at the requested rate schedule. If the requested increase is implemented and the underlying assumptions are realized, no further premium rate schedule increases are anticipated. However, going forward, the Company will continue to monitor the experience of this block and reserves the right to take additional rate action if currently unanticipated future deterioration thereof justifies.

Brad Rokosh, ASA, MAAA
Head of Financial Assets Product Management

January 16, 2024

Attachment A

Transamerica Life Insurance Company

Distribution of Business

By Issue Age

0 to 59	76.8%
60 to 64	16.3%
65 to 69	5.7%
70 to 74	1.1%
75 to 79	0.1%
80 to 84	0.0%
85 +	0.0%

By Elimination Period

0 day	20 day	30 day	60 day	90 day	> 90 days
9.4%	11.6%	0%	49.9%	29.1%	0%

By Maximum Benefit Option

≤2 Yr	3 Yr	4 Yr	≥5 Yr*	Unlimited
3.0%	8.5%	25.0%	0%	63.5%

* **Not including Unlimited.**

Attachment B

Transamerica Life Insurance Company

Rate Increase History

Policy Form	First Increase (Approved)	Second Increase (Approved)	Third Increase (Approved)	Fourth Increase (Approved)	Fifth Increase (Approved)	Sixth Increase (Approved)	Seventh Increase (Approved)	Eighth Increase* (Approved)	Ninth Increase* (Approved)
NEA Group (BP < 4 years)	20% (2005)	20% (2006)				15% (2013)	15% (2017)	10% (2021)	10% (2021)
NEA Group (4 ≤ BP < 6 years)	20% (2005)	20% (2006)	20% (2008)			15% (2013)	15% (2017)	10% (2021)	10% (2021)
NEA Group (BP ≥ 6 years)	20% (2005)	20% (2006)	20% (2008)	20% (2009)	14% (2011)	15% (2013)	15% (2017)	12.5% (2021)	12.5% (2021)

*Applies only to policies/certificates with a Benefit Increase Option and Issue Age <=69.

Appendix A

Benefit Reduction and Cost Sharing Option (with Rate Guarantee)

The Benefit Reduction and Cost Sharing Endorsement (the "Endorsement") consists of three components:

1. Reduction to all policy or certificate benefit amounts, including but not limited to the Maximum Daily Benefit, Maximum Monthly Benefit and the policy or certificate Maximum Amount

   All policy or certificate benefit amounts (including, but not limited to, all Maximum Daily/Monthly Benefit amounts and the policy or certificate Maximum Amount) in effect immediately prior to the Endorsement effective date will be reduced by an amount equal to the Cost Sharing Percentage as shown below.

   For example:

   If the policy or certificate Maximum Amount is $100,000 and the Cost Sharing Percentage is 20%, the policy/certificate Maximum Amount will be reduced to $80,000. The Company will not be responsible for any costs that exceed the reduced policy/certificate Maximum Amount.

   If the Maximum Daily Benefit amount is $100, and the Cost Sharing Percentage is 20%, the Maximum Daily Benefit amount will be reduced to $80. The Company will not be responsible for any daily costs that exceed the reduced Maximum Daily Benefit.

   The dollar amount and percentages used in these examples may be different from the actual dollar amounts and percentages that apply to the policy/certificate.

2. Application of Cost Sharing to Claim Payments

   As long as all policy/certificate provisions and conditions are satisfied, for any benefit for which a claim is made under the policy/certificate, the Company will pay its Cost Sharing Percentage of such benefit, but the Company will pay no more than the applicable Maximum Daily/Monthly Benefit amounts as shown on the Endorsement. The policyholder/certificate holder will be responsible for paying the remaining portion of the applicable long term care expenses associated with such claim. Note that only amounts paid by the Company will be deducted from the revised policy/certificate Maximum Amount.

   For example: If the revised Maximum Daily Benefit for a covered Long Term Care Facility is $80 and the Company's Cost Sharing Percentage is 80%, the Company will pay 80% of the Long Term Care Facility charges, but no more than $80. Using the same formula:
   - If the Long Term Care Facility charges are $80, the Company will pay $64 and the policyholder/certificate holder will be responsible for $16.
   - If the Long Term Care Facility charges are $100, the Company will pay $80 and the policyholder/certificate holder will be responsible for $20.
   - If the Long Term Care Facility charges are $200, the Company will pay $80 and the policyholder/certificate holder will be responsible for $120.

3. Rate Guarantee

   Premium rates for the policy will be guaranteed from the effective date of the Endorsement for 10 years. The policy will be excluded from any future increases until after the Rate Guarantee has expired. Any benefits added to the policy after the effective date of the Endorsement will not be covered by the Rate Guarantee.

See "Appendix A: Cost Sharing Percentages Table" for the Benefit Reduction and Cost Sharing Agreement Percentages by Company (or Former Company), Benefit Increase Option, and Benefit Period.

Appendix A - Cost Sharing Percentages Table

Company (or Former Company*)	Benefit Increase Option	Benefit Period	Cost Sharing%	Required Remaining RINC
LIICA	Compound	2-year	**30%**	
	Compound	4-year	**30%**	
	Compound	Lifetime	**30%**	**26.0%**
	No Bio	2-year	**30%**	**59.7%**
	No Bio	4-year	**30%**	**59.5%**
	No Bio	Lifetime	**30%**	**78.5%**
	Simple	2-year	**30%**	**31.6%**
	Simple	4-year	**30%**	**31.3%**
	Simple	Lifetime	**30%**	**57.4%**

***For Company (or Former Company), please refer to the cover letter for the complete mapping of policy forms.**

Appendix B

In conjunction with the pending rate increase filing, Transamerica would like to offer policyholders the option to cancel their long-term care insurance policy in exchange for a one-time, lump-sum, policy cancellation payment in an amount to be determined based on the formula set forth below. The policyholder will be given the option to cancel their policy as an alternative to the premium increase. The idea behind the policy cancellation is to provide policyholders with an additional choice, which is different from the range of benefit reduction options that is routinely offered in connection with premium increases. All of the available options – including the policy cancellation offer and benefit reduction options – will be explained more fully in the rate increase notification package. Any policyholder who expresses interest in the policy cancellation offer will also receive a policy cancellation agreement (included with this filing) that the policyholder will be required to sign and return before the policy is cancelled and the policy cancellation payment is issued to the policyholder.

The policyholder will be advised that they do not have to cancel their policy and that they should carefully consider whether or not it is the right option for them. The policyholder will be advised that if they choose to cancel their policy, it will terminate and they will not be able to reinstate it under any circumstances. Once the policyholder completes the policy cancellation there will never be any benefits available – including, for example, any return of premium benefit. We will strongly encourage the policyholder to consult with their family members and tax, legal and financial advisors before making the decision on whether or not to cancel their policy.

The policy cancellation payment amount will be the greater of:

- X% of Transamerica's estimate of the value of the policy, and
- $2,000

Transamerica's estimate of the value ("Value") of the policy is based on the present value of the best estimate cash flows (benefits and expenses less future premiums). Our estimate of the Value of the policy is only an estimate – the actual benefit payments a policyholder could receive if they choose to keep their policy in force and later become eligible for benefits under the policy may be higher or lower than our estimate. Our estimate of the Value of each policy will vary depending on numerous characteristics, including issue age, issue date, gender, marital status at the time of issue, policy benefit characteristics and other factors. Our estimate of the Value of one policy will likely be different from our estimate of the Value of other policies, even between spouses who have paid similar premium amounts. Because the Company's estimate of the policy's Value is consistent with how the Company calculates reserves and is intended to capture all significant differences in experience across many variables, we believe that this formula does not unfairly discriminate between policyholders, but we ask the Department of Insurance to formally approve the policy cancellation payment calculation method. The same methodology will be used to calculate the Value for each policyholder subject to this rate increase filing, including policyholders that may currently be on claim. The same methodology and the same fixed percentage of the policy's Value will be used to calculate the policy cancellation payment that is being offered to every policyholder in the state.

The policyholder will be told that we cannot provide advice regarding the tax consequences associated with cancelling their policy. The tax treatment of each individual's policy cancellation payment could be affected by whether the policyholder previously deducted or excluded premiums from their taxable income or whether the policyholder's premiums were paid by their employer. We will advise the policyholder that before choosing the policy cancellation option, they should consult with their own personal tax advisor regarding the tax treatment of the transaction, including the tax treatment of the policy cancellation payment that would be made if they cancel their policy. The policyholder will also be advised that we may send to the Internal Revenue Service and the policyholder an IRS Form 1099 reporting taxable income with respect to the policy cancellation payment. In some circumstances the amount of taxable income the policyholder realizes from the policy cancellation payment could exceed the amount that we report on IRS Form 1099.

Exhibit I
Transamerica Life Insurance Company
NEA Group

Nationwide Experience Adjusted to Maryland-Specific Rate History
All Policyholders Pay the Requested Increase

	Earned Premium		Incurred Claims	Loss Ratios Excluding Change in ALR			
Year	Actual Past & Projected Future w/o Proposed Rate Increase	Actual Past & Projected Future w/ Proposed Rate Increase	Actual Past & Projected Future	Actual w/o Rate Increase	Actual w/ Rate Increase	PV Actual Cumulative w/o Rate Increase	PV Actual Cumulative w/ Rate Increase
1991-1992	7,212	7,212	0	0.0%	0.0%	0.0%	0.0%
1993	7,634	7,634	0	0.0%	0.0%	0.0%	0.0%
1994	14,605	14,605	0	0.0%	0.0%	0.0%	0.0%
1995	60,316	60,316	0	0.0%	0.0%	0.0%	0.0%
1996	151,263	151,263	0	0.0%	0.0%	0.0%	0.0%
1997	878,910	878,910	0	0.0%	0.0%	0.0%	0.0%
1998	2,628,150	2,628,150	10,359	0.4%	0.4%	0.3%	0.3%
1999	4,940,864	4,940,864	695,687	14.1%	14.1%	7.9%	7.9%
2000	7,450,499	7,450,499	778,084	10.4%	10.4%	9.0%	9.0%
2001	9,747,893	9,747,893	755,681	7.8%	7.8%	8.6%	8.6%
2002	11,920,964	11,920,964	1,576,771	13.2%	13.2%	9.9%	9.9%
2003	13,253,449	13,253,449	1,921,827	14.5%	14.5%	11.0%	11.0%
2004	12,996,720	12,996,720	2,628,359	20.2%	20.2%	12.7%	12.7%
2005	12,979,674	12,979,674	3,635,838	28.0%	28.0%	15.0%	15.0%
2006	14,896,877	14,896,877	3,167,261	21.3%	21.3%	15.9%	15.9%
2007	16,912,507	16,912,507	4,136,231	24.5%	24.5%	17.0%	17.0%
2008	16,907,713	16,907,713	4,273,751	25.3%	25.3%	17.9%	17.9%
2009	18,705,579	18,705,579	5,037,429	26.9%	26.9%	18.9%	18.9%
2010	20,007,735	20,007,735	6,615,568	33.1%	33.1%	20.3%	20.3%
2011	19,986,566	19,986,566	5,820,754	29.1%	29.1%	21.0%	21.0%
2012	20,739,762	20,739,762	6,685,940	32.2%	32.2%	21.9%	21.9%
2013	20,208,520	20,208,520	12,283,101	60.8%	60.8%	24.6%	24.6%
2014	21,996,388	21,996,388	11,419,870	51.9%	51.9%	26.4%	26.4%
2015	21,282,889	21,282,889	14,148,735	66.5%	66.5%	28.7%	28.7%
2016	20,417,982	20,417,982	13,223,561	64.8%	64.8%	30.5%	30.5%
2017	19,401,296	19,401,296	12,892,723	66.5%	66.5%	32.1%	32.1%
2018	19,931,683	19,931,683	13,587,470	68.2%	68.2%	33.6%	33.6%
2019	20,349,736	20,349,736	16,019,759	78.7%	78.7%	35.3%	35.3%
2020	18,909,603	18,909,603	10,748,730	56.8%	56.8%	36.1%	36.1%
2021	18,642,804	18,642,804	22,034,034	118.2%	118.2%	38.6%	38.6%
2022Q123	14,649,469	14,649,469	16,847,872	115.0%	115.0%	40.3%	40.3%
2022Q4	4,725,945	4,725,945	6,336,697	134.1%	134.1%	41.0%	41.0%
2023	19,495,530	19,495,530	26,675,432	136.8%	136.8%	43.6%	43.6%
2024	18,276,910	18,276,910	29,008,618	158.7%	158.7%	46.4%	46.4%
2025	17,045,242	30,424,854	31,382,513	184.1%	103.1%	49.3%	48.5%
2026	15,827,736	32,906,653	33,780,005	213.4%	102.7%	52.3%	50.5%
2027	14,629,440	30,429,234	36,096,104	246.7%	118.6%	55.4%	52.7%
2028	13,454,978	27,986,354	38,276,524	284.5%	136.8%	58.6%	54.9%
2029	12,309,553	25,603,870	40,189,132	326.5%	157.0%	61.8%	57.3%
2030	11,197,936	23,291,707	41,878,353	374.0%	179.8%	65.1%	59.7%
2031	10,125,439	21,060,914	43,291,959	427.6%	205.6%	68.3%	62.2%
2032	9,096,976	18,921,710	44,277,811	486.7%	234.0%	71.5%	64.6%
2033	8,116,296	16,881,896	44,778,220	551.7%	265.2%	74.5%	67.0%
2034	7,187,851	14,950,730	44,818,193	623.5%	299.8%	77.5%	69.4%
2035	6,316,372	13,138,053	44,398,288	702.9%	337.9%	80.4%	71.6%
2036	5,506,237	11,452,973	43,545,484	790.8%	380.2%	83.0%	73.8%
2037	4,760,696	9,902,247	42,160,252	885.6%	425.8%	85.5%	75.8%
2038	4,081,111	8,488,710	40,269,644	986.7%	474.4%	87.8%	77.7%
2039	3,468,331	7,214,128	37,993,608	1095.4%	526.7%	89.9%	79.4%
2040	2,922,423	6,078,639	35,387,867	1210.9%	582.2%	91.8%	80.9%
2041	2,442,141	5,079,653	32,543,271	1332.6%	640.7%	93.4%	82.3%
2042	2,024,741	4,211,462	29,502,633	1457.1%	700.5%	94.8%	83.5%
2043	1,666,027	3,465,336	26,376,305	1583.2%	761.1%	96.1%	84.5%
2044	1,361,198	2,831,291	23,327,817	1713.8%	823.9%	97.1%	85.4%
2045	1,104,910	2,298,214	20,400,173	1846.3%	887.7%	98.0%	86.1%
2046	891,677	1,854,688	17,652,434	1979.7%	951.8%	98.7%	86.7%
2047	715,813	1,488,891	15,092,643	2108.5%	1013.7%	99.3%	87.2%
2048	571,840	1,189,426	12,788,164	2236.3%	1075.2%	99.8%	87.6%
2049	454,843	946,074	10,770,921	2368.1%	1138.5%	100.2%	88.0%
2050	360,425	749,684	9,019,049	2502.3%	1203.0%	100.5%	88.2%
2051	284,750	592,281	7,505,442	2635.8%	1267.2%	100.8%	88.4%
2052	224,458	466,874	6,200,376	2762.4%	1328.1%	101.0%	88.6%
2053	176,690	367,516	5,101,925	2887.5%	1388.2%	101.1%	88.7%
2054	139,033	289,189	4,192,347	3015.4%	1449.7%	101.3%	88.8%
2055	109,471	227,700	3,444,130	3146.2%	1512.6%	101.4%	88.9%
2056	86,358	179,624	2,838,790	3287.2%	1580.4%	101.4%	89.0%
2057	68,321	142,108	2,341,698	3427.5%	1647.8%	101.5%	89.0%
2058	54,251	112,842	1,948,628	3591.9%	1726.9%	101.5%	89.1%
2059	43,263	89,986	1,633,102	3774.9%	1814.8%	101.6%	89.1%
2060	34,654	72,080	1,376,961	3973.5%	1910.3%	101.6%	89.1%
2061	27,879	57,988	1,178,172	4226.0%	2031.8%	101.6%	89.2%
2062	22,506	46,812	1,010,872	4491.6%	2159.4%	101.7%	89.2%
2063	18,210	37,876	873,383	4796.2%	2305.9%	101.7%	89.2%
2064	14,746	30,671	755,630	5124.4%	2463.7%	101.7%	89.2%
PV Past	159,684,663	159,684,663	64,363,000	40.3%	40.3%		
PV Future	36,180,865	63,581,846	134,812,573	372.6%	212.0%		
PV Lifetime	195,865,528	223,266,508	199,175,573	101.7%	89.2%		

Exhibit II
Transamerica Life Insurance Company
NEA Group
Nationwide Experience Adjusted to Maryland-Specific Rate History
Actual To Expected Lifetime Experience
Actual Nationwide Experience Through 9/30/2022 and Projected Thereafter

	Actual				Expected			Actual to Expected		
	A	B	C	D	E	F	G	H=A/E	I=C/F	J=D/G
Duration	Earned Premium @ Original Rate Level	Earned Premium Adjusted To Approved Maryland Rate History	Incurred Claims Excluding ALR Increase	Cumulative Loss Ratio Excluding ALR Increase	Earned Premium @ Original Rate Level	Incurred Claims Excluding ALR Increase	Cumulative Loss Ratio Excluding ALR Increase	Actual to Expected Earned Premium	Actual to Expected Incurred Claims Excluding ALR Increase	Cumulative Loss Ratio Excluding ALR Increase
1	14,647,274	14,647,274	332,089	2.3%	14,647,274	720,330	4.9%	100.0%	46.1%	46.1%
2	13,790,024	13,790,024	1,481,430	6.3%	12,819,681	1,018,464	6.3%	107.6%	145.5%	99.8%
3	13,317,034	13,353,657	648,778	5.8%	11,569,814	1,369,371	7.9%	115.1%	47.4%	74.4%
4	13,114,069	13,476,073	1,044,066	6.3%	10,637,028	1,714,947	9.5%	123.3%	60.9%	66.1%
5	12,916,051	13,960,117	3,070,454	9.2%	9,848,274	1,811,627	10.8%	131.2%	169.5%	84.6%
6	12,702,525	14,701,247	3,566,903	11.5%	9,125,944	1,894,024	12.0%	139.2%	188.3%	96.1%
7	12,417,022	15,663,398	2,856,765	12.5%	8,444,040	2,102,266	13.2%	147.1%	135.9%	94.3%
8	12,158,659	16,908,114	3,909,756	13.8%	7,799,381	2,300,115	14.5%	155.9%	170.0%	95.3%
9	11,834,222	18,119,465	5,516,941	15.7%	7,190,547	2,446,642	15.7%	164.6%	225.5%	99.8%
10	11,433,550	19,096,986	6,104,240	17.3%	6,616,367	2,561,328	16.9%	172.8%	238.3%	102.5%
11	10,881,033	19,644,330	5,681,751	18.4%	6,075,638	2,641,036	18.1%	179.1%	215.1%	101.6%
12	10,419,039	20,285,140	6,891,245	19.7%	5,568,799	2,954,070	19.4%	187.1%	233.3%	101.4%
13	10,073,297	20,931,291	6,089,173	20.4%	5,095,022	3,222,753	20.8%	197.7%	188.9%	98.1%
14	9,695,602	21,179,900	9,983,079	22.2%	4,652,296	3,433,503	22.2%	208.4%	290.8%	100.0%
15	9,290,245	21,119,260	9,879,741	23.7%	4,240,158	3,608,080	23.7%	219.1%	273.8%	100.2%
16	8,876,819	20,939,993	14,999,875	26.4%	3,855,893	3,729,244	25.1%	230.2%	402.2%	104.9%
17	8,472,766	20,753,253	12,795,874	28.1%	3,497,949	4,034,064	26.6%	242.2%	317.2%	105.5%
18	8,095,379	20,525,292	14,582,975	30.0%	3,163,840	4,261,596	28.2%	255.9%	342.2%	106.6%
19	7,701,454	20,225,977	15,164,546	31.9%	2,852,095	4,411,611	29.7%	270.0%	343.7%	107.2%
20	7,220,837	19,851,716	12,804,767	33.0%	2,561,887	4,488,799	31.2%	281.9%	285.3%	105.8%
21	6,811,603	19,776,183	17,562,812	34.9%	2,293,854	4,505,361	32.7%	297.0%	389.8%	106.9%
22	6,447,468	19,703,915	21,830,414	37.3%	2,046,654	5,044,110	34.3%	315.0%	432.8%	108.8%
23	6,034,627	19,257,002	22,571,132	39.6%	1,819,655	5,492,299	36.0%	331.6%	411.0%	110.0%
24	5,614,915	18,561,912	29,961,180	42.7%	1,611,129	5,852,275	37.7%	348.5%	512.0%	113.1%
25	5,215,814	17,677,871	29,854,062	45.5%	1,425,496	6,120,189	39.5%	365.9%	487.8%	115.3%
26	4,824,604	16,572,453	33,453,744	48.6%	1,255,013	6,281,199	41.2%	384.4%	532.6%	118.0%
27	4,441,578	15,347,934	35,467,755	51.8%	1,100,660	6,413,116	42.9%	403.5%	553.1%	120.7%
28	4,074,737	14,124,882	37,900,074	55.1%	960,313	6,438,639	44.6%	424.3%	588.6%	123.6%
29	3,716,377	12,913,288	40,390,029	58.4%	833,317	6,360,612	46.1%	446.0%	635.0%	126.7%
30	3,371,050	11,737,068	42,176,407	61.8%	718,475	6,179,635	47.6%	469.2%	682.5%	129.9%
31	3,039,175	10,601,446	43,826,844	65.2%	615,761	5,916,845	48.9%	493.6%	740.7%	133.2%
32	2,721,773	9,511,437	45,023,176	68.5%	524,479	5,897,339	50.2%	518.9%	763.4%	136.4%
33	2,420,439	8,473,058	45,735,646	71.7%	443,336	5,787,681	51.4%	546.0%	790.2%	139.6%
34	2,136,630	7,491,957	46,177,328	74.9%	371,043	5,637,065	52.5%	575.8%	819.2%	142.6%
35	1,871,633	6,573,106	45,739,828	77.9%	312,628	5,450,432	53.6%	598.7%	839.2%	145.4%
36	1,626,558	5,720,926	44,977,731	80.8%	261,316	5,203,561	54.5%	622.4%	864.4%	148.0%
37	1,401,885	4,937,693	43,728,141	83.4%	217,294	4,819,183	55.4%	645.2%	907.4%	150.6%
38	1,198,003	4,225,290	41,957,935	85.9%	178,998	4,434,413	56.2%	669.3%	946.2%	152.9%
39	1,015,209	3,585,196	39,762,214	88.1%	146,703	4,070,853	56.8%	692.0%	976.8%	155.1%
40	853,297	3,017,116	36,951,616	90.1%	118,844	3,694,933	57.4%	718.0%	1000.1%	157.0%
41	711,566	2,518,995	33,973,426	91.9%	94,709	3,300,962	57.9%	751.3%	1029.2%	158.7%
42	588,825	2,086,994	30,844,114	93.4%	74,608	2,926,075	58.3%	789.2%	1054.1%	160.2%
43	483,677	1,716,455	27,712,391	94.8%	58,245	2,540,551	58.7%	830.4%	1090.8%	161.6%
44	394,639	1,402,316	24,637,317	95.9%	42,939	2,201,237	59.0%	919.1%	1119.2%	162.7%
45	320,035	1,138,801	21,500,482	96.9%	34,079	1,954,624	59.2%	939.1%	1100.0%	163.6%
46	258,091	919,759	18,576,519	97.7%	26,927	1,721,340	59.4%	958.5%	1079.2%	164.4%
47	207,045	739,041	15,900,402	98.3%	20,842	1,404,540	59.6%	993.4%	1132.1%	165.0%
48	165,280	590,996	13,554,629	98.8%	15,827	1,124,044	59.7%	1044.3%	1205.9%	165.6%
49	131,359	470,589	11,489,029	99.3%	11,866	889,654	59.8%	1107.0%	1291.4%	166.0%
50	104,004	373,331	9,608,256	99.6%	8,635	682,380	59.9%	1204.4%	1408.0%	166.4%
51	82,086	295,270	7,981,021	99.9%	6,102	508,471	59.9%	1345.3%	1569.6%	166.7%
52	64,621	232,954	6,591,883	100.1%	4,319	376,640	59.9%	1496.3%	1750.2%	167.0%
53	50,776	183,459	5,441,115	100.3%	2,606	220,488	60.0%	1948.3%	2467.8%	167.2%
54	39,865	144,374	4,482,632	100.4%	1,259	145,011	60.0%	3166.2%	3091.2%	167.4%
55	31,311	113,675	3,673,171	100.5%	974	125,879	60.0%	3215.2%	2918.0%	167.6%
56	24,637	89,669	3,011,826	100.6%	753	108,811	60.0%	3273.6%	2767.9%	167.7%
57	19,443	70,950	2,469,590	100.7%	555	84,130	60.0%	3503.5%	2935.4%	167.8%
58	15,408	56,379	2,035,655	100.7%	400	63,512	60.0%	3852.5%	3205.1%	167.8%
59	12,276	45,042	1,698,164	100.8%	289	47,933	60.0%	4251.9%	3542.8%	167.9%
60	9,839	36,196	1,419,604	100.8%	200	34,409	60.0%	4919.9%	4125.7%	167.9%
61	7,927	29,243	1,205,210	100.8%	134	23,450	60.0%	5928.8%	5139.6%	168.0%
62	6,241	23,136	981,649	100.8%	85	14,854	60.0%	7360.1%	6608.6%	168.0%
63	4,810	17,974	775,704	100.9%	37	4,472	60.0%	12889.7%	17344.9%	168.0%
64	3,347	12,705	584,396	100.9%			60.0%			168.1%
65+	3,238	12,635	764,266	100.9%			60.0%			168.1%
PV Lifetime	171,014,841	296,256,202	298,866,555	100.9%	108,008,566	64,823,211	60.0%	158.3%	461.0%	168.1%

Exhibit IV
Transamerica Life Insurance Company
NEA Group

Blended If-Knew / Make-Up Approach (Minnesota method)*

% of Active Policyholders Remaining	50.6%
If-Knew Increase	191.6%
Make-Up Increase	2093.5%
Blended Increase	1153.7%
Cost-Sharing Increase	
0-15%	15.00%
15-50%	31.50%
50-100%	37.50%
100-150%	32.50%
>150%	501.87%
Maximum Allowable Rate Increase	108.4%

** Based off of Exhibit I*