

State: District of Columbia **Filing Company:** American Heritage Life Insurance Company
TOI/Sub-TOI: H071 Individual Health - Specified Disease - Limited Benefit/H071.001 Critical Illness
Product Name: CILP1 (Rate Filing)
Project Name/Number: Direct Sales Informational Filing/

Filing at a Glance

Company: American Heritage Life Insurance Company
Product Name: CILP1 (Rate Filing)
State: District of Columbia
TOI: H071 Individual Health - Specified Disease - Limited Benefit
Sub-TOI: H071.001 Critical Illness
Filing Type: Rate
Date Submitted: 01/24/2014
SERFF Tr Num: ALST-129388170
SERFF Status: Pending Industry Response
State Tr Num:
State Status:
Co Tr Num:

Implementation
Date Requested:
Author(s): Jennifer Aiello, Patti Romo, Sara Welch, Rachel Onsum
Reviewer(s): Darniece Shirley (primary), Alula Selassie, Donghan Xu
Disposition Date:
Disposition Status:
Implementation Date:

State Filing Description:

State: District of Columbia
TOI/Sub-TOI: H071 Individual Health - Specified Disease - Limited Benefit/H071.001 Critical Illness
Product Name: CILP1 (Rate Filing)
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Filing Company: American Heritage Life Insurance Company

General Information

Project Name: Direct Sales Informational Filing

Status of Filing in Domicile: Authorized

Project Number:

Date Approved in Domicile: 01/23/2014

Requested Filing Mode: Informational

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Individual Market Type:

Overall Rate Impact:

Filing Status Changed: 01/31/2014

Deemer Date:

State Status Changed:

Submitted By: Sara Welch

Created By: Sara Welch

Corresponding Filing Tracking Number: ALST-129368171

Filing Description:

RE: American Heritage Life Insurance Company, NAIC # 60534

Informational Filing on Critical Illness Policy CILP1

To Whom It May Concern:

When our critical illness policy and associated riders were originally filed with your department, we planned to sell them in the payroll deduction market only and our actuarial memorandum filed with your department reflected this market segment. This letter is to inform you of our intention to sell this product in the individual market as well.

Our actuaries have determined that the premium rates charged for this product will not change from those originally filed and currently in use.

The Actuarial Memorandum for policy CILP1 and riders was approved by your department on June 17, 2002. Please add this notification to your original file for this product.

This informational rate filing is in response to an objection to informational form filing ALST-129368171. The objection states that, although our rates are not changing, this informational rate filing needs to be submitted.

If you have any questions, please contact me at 904-992-2541, or by email at jhop4@allstate.com. Thank you.

Company and Contact

Filing Contact Information

Jennifer Aiello, Filing Analyst

jhop4@allstate.com

Attn: Legal/Compliance

904-992-2541 [Phone]

1776 American Heritage Life Drive

904-992-2975 [FAX]

Jacksonville, FL 32224-9983

State: District of Columbia **Filing Company:** American Heritage Life Insurance Company
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Filing Company Information

American Heritage Life Insurance
 Company
 ATTN: Legal/Compliance
 1776 American Heritage Life Drive
 Jacksonville, FL 32224-9983
 (904) 992-1776 ext. [Phone]

CoCode: 60534
 Group Code: 8
 Group Name: Allstate
 FEIN Number: 59-0781901

State of Domicile: Florida
 Company Type: Life and
 Health
 State ID Number:

Filing Fees

Fee Required? No
 Retaliatory? No
 Fee Explanation:

SERFF Tracking #:

ALST-129388170

State Tracking #:

Company Tracking #:

State: District of Columbia

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Correspondence Summary

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Industry Response	Darniece Shirley	01/31/2014	01/31/2014

Response Letters

Responded By	Created On	Date Submitted
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Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Withdrawal Request	Note To Reviewer	Sara Welch	02/04/2014	02/04/2014

State: District of Columbia **Filing Company:** American Heritage Life Insurance Company
TOI/Sub-TOI: H071 Individual Health - Specified Disease - Limited Benefit/H071.001 Critical Illness
Product Name: CILP1 (Rate Filing)
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Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	01/31/2014
Submitted Date	01/31/2014
Respond By Date	02/21/2014

Dear Jennifer Aiello,

Introduction:

Thank you for your recent filing. Please see below for additional information requested to continue review of the rate filing since the initial filing was made prior to SERFF.

Objection 1

Comments: The Rate Review Data Detail section of the filing is missing. The State understands this is a new filing and not required, however completing would be preferred. Please correct, via post-submission update.

Objection 2

- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)

Comments: Please provide the rate manual and the premium calculation procedures.

Objection 3

Comments: Please provide the average annual premium for the proposed product.

Objection 4

Comments: Please provide a detailed, line-by-line, make-up of expenses as a percentage of premiums. Each expense item should be accounted for separately and total 100%. Expenses such as profit, expected loss ratio, commission, e.g. should be included. Expenses such as taxes, administrative, et al should not be grouped together.

Objection 5

- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)

Comments: What trend assumptions (medical and insurance), if any are being made? Please justify.

Objection 6

- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)

Comments: What interest rate assumptions, if any are being made? Please justify.

Objection 7

- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)

Comments: Please provide a persistency table and justification for this initial filing.

Objection 8

- Actuarial Memorandum (Supporting Document)

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- Actuarial Justification (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)

Comments: Please provide mortality and morbidity assumptions and justifications for this rate filing per DCs Health Rate Filing Instructions. Please see <http://disb.dc.gov/sites/default/files/dc/sites/disb/publication/attachments/Health%20Rate%20Filing%20-%20102012.pdf> for more information.

Objection 9

- Cover Letter All Filings (Supporting Document)
- Certificate of Authority to File (Supporting Document)
- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- District of Columbia and Countrywide Loss Ratio Analysis (P&C) (Supporting Document)
- District of Columbia and Countrywide Experience for the Last 5 Years (P&C) (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)
- Unified Rate Review Template (Supporting Document)

Comments: Please confirm: Dispositions with respects to this filing are being made on behalf of residents of the District of Columbia only.

Objection 10

- Cover Letter All Filings (Supporting Document)
- Certificate of Authority to File (Supporting Document)
- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- District of Columbia and Countrywide Loss Ratio Analysis (P&C) (Supporting Document)
- District of Columbia and Countrywide Experience for the Last 5 Years (P&C) (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)
- Unified Rate Review Template (Supporting Document)

Comments: Please note, this rate filing is subject to conformity with the corresponding forms filing. This department reserves the right to withdraw the filing if not.

Conclusion:

Sincerely,
Darniece Shirley

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Note To Reviewer

Created By:

Sara Welch on 02/04/2014 08:37 AM

Last Edited By:

Sara Welch

Submitted On:

02/04/2014 08:37 AM

Subject:

Withdrawal Request

Comments:

At this time, we respectfully request to withdraw our filing from further review.

Please let us know if there are any questions. Thank you for your consideration.

Sincerely,

Sara Thompson Welch

SERFF Tracking #:

ALST-129388170

State Tracking #:

Company Tracking #:

State:

District of Columbia

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Product Name:

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Direct Sales Informational Filing/

Supporting Document Schedules

Satisfied - Item:	Cover Letter All Filings
Comments:	
Attachment(s):	CILP1 Direct Sales Letter for Informational Rate Filing DC.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Certificate of Authority to File
Bypass Reason:	Not applicable to this filing; not filed by a third party.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Actuarial Memorandum
Bypass Reason:	Not applicable to this informational filing.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Actuarial Justification
Bypass Reason:	Not applicable to this filing; no new rates being filed.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	District of Columbia and Countrywide Loss Ratio Analysis (P&C)
Bypass Reason:	Not applicable to this filing; not P&C.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	District of Columbia and Countrywide Experience for the Last 5 Years (P&C)
Bypass Reason:	Not applicable to this filing; not P&C.
Attachment(s):	
Item Status:	
Status Date:	

SERFF Tracking #:

ALST-129388170

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Company Tracking #:

State:

District of Columbia

Filing Company:

American Heritage Life Insurance Company

TOI/Sub-TOI:

H071 Individual Health - Specified Disease - Limited Benefit/H071.001 Critical Illness

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CILP1 (Rate Filing)

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Direct Sales Informational Filing/

Bypassed - Item:	Actuarial Memorandum and Certifications
Bypass Reason:	Not applicable to this informational filing.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Unified Rate Review Template
Bypass Reason:	Not applicable to this filing; no rate increase being proposed.
Attachment(s):	
Item Status:	
Status Date:	



Jennifer R. Aiello, ALMI, ACS, AIRC
Assistant Manager
Ordinary Insurance

Product Support Department

January 24, 2014

Department of Insurance, Securities, and Banking
810 First Street, NE
Suite 701
Washington, DC 20002

RE: American Heritage Life Insurance Company, NAIC # 60534
Informational Filing on Critical Illness Policy CILP1

To Whom It May Concern:

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If you have any questions, please contact me at 904-992-2541, or by email at jhop4@allstate.com. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Jennifer R. Aiello". The signature is written in a cursive, flowing style.

Jennifer R. Aiello, ALMI, ACS, AIRC