

SERFF Tracking #:

GARD-128912291

State Tracking #:

Company Tracking #:

State:

District of Columbia

Filing Company:

The Guardian Life Insurance Company of America

TOI/Sub-TOI:

H20G Group Health - Vision/H20G.000 Health - Vision

Product Name:

6/1/2013 Washington, DC Vision Filing

Project Name/Number:

/

Rate Information

Rate data applies to filing.

Filing Method:

SERFF

Rate Change Type:

Increase

Overall Percentage of Last Rate Revision:

1.250%

Effective Date of Last Rate Revision:

08/01/2012

Filing Method of Last Filing:

SERFF

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 req'd):	Minimum % Change (where req'd):
The Guardian Life Insurance Company of America	-1.000%	-1.000%	\$-5,211	78	\$1,042,278	11.800%	-11.700%

State: District of Columbia

Filing Company:

The Guardian Life Insurance Company of America

TOI/Sub-TOI: H20G Group Health - Vision/H20G.000 Health - Vision

Product Name: 6/1/2013 Washington, DC Vision Filing

Project Name/Number: /

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		VC-1-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	New		VC-1-DC (June 2013).pdf,
2		VC-2-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	New		VC-2-DC (June 2013).pdf,
3		VC-3-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	New		VC-3-DC (June 2013).pdf,
4		VC-30-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number: February 2013 Percent Rate Change Request:	VC-30-DC (June 2013).pdf,
5		VC-31-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number: February 2013 Percent Rate Change Request:	VC-31-DC (June 2013).pdf,
6		VC-32-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number: February 2010 Percent Rate Change Request:	VC-32-DC (June 2013).pdf,
7		VC-33-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number: February 2010 Percent Rate Change Request:	VC-33-DC (June 2013).pdf,
8		VC-34-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number: February 2010 Percent Rate Change Request:	VC-34-DC (June 2013).pdf,

THE GUARDIAN Life Insurance Company of America

VISION CARE PREMIUM RATES

Line 1A - VISION CARE STARTING RATES

YSP STARTING RATES

		Copoly											
		\$0	\$5	\$10	\$15	\$20	\$25	\$30	\$35	\$40	\$45	\$50	
a. Exam Plus (EP)													
	12 month benefit	\$1.44	\$1.25	\$1.07	\$0.89	\$0.73	\$0.57	N/A	N/A	N/A	N/A	N/A	
	24 month benefit	\$1.08	\$0.94	\$0.80	\$0.67	\$0.54	\$0.42	N/A	N/A	N/A	N/A	N/A	
b. Exam/Lenses/Frames													
	12/12/12 month benefit (Plan C)	\$14.92	\$14.04	\$13.16	\$12.36	\$10.83	\$10.12	\$9.46	\$8.84	\$8.25	\$7.71	\$7.20	
	12/12/24 month benefit (Plan B)/Enhanced B	\$12.57	\$11.77	\$11.01	\$10.28	\$8.95	\$8.34	\$7.77	\$7.24	\$6.74	\$6.28	\$5.85	
	12/24/24 month benefit (Plan A)	\$10.43	\$9.75	\$9.10	\$8.49	\$7.36	\$6.83	\$6.34	\$5.88	\$5.46	\$5.06	\$4.70	
	24/24/24 month benefit (Plan D)	\$8.22	\$7.73	\$7.26	\$6.82	\$5.98	\$5.57	\$5.18	\$4.83	\$4.50	\$4.19	\$3.90	
		Split Copay (Exam / (Lenses & Frames))											
		\$0/\$0	\$0/\$10	\$0/\$20	\$10/\$10	\$10/\$15	\$10/\$20	\$10/\$25	\$15/\$15	\$15/\$20	\$15/\$25	\$20/\$20	
c. Exam/Lenses/Frames													
	12/12/12 month benefit (Plan C)	\$14.92	\$13.64	\$12.16	\$12.01	\$11.33	\$10.64	\$9.35	\$9.96	\$9.65	\$9.34	\$8.66	
	12/12/24 month benefit (Plan B)/Enhanced B	\$12.57	\$11.46	\$10.17	\$9.98	\$9.40	\$8.81	\$7.72	\$8.25	\$7.95	\$7.65	\$7.09	
	12/24/24 month benefit (Plan A)	\$10.43	\$9.56	\$8.55	\$8.30	\$7.84	\$7.38	\$6.49	\$6.85	\$6.64	\$6.43	\$5.90	
	24/24/24 month benefit (Plan D)	\$8.22	\$7.52	\$6.69	\$6.62	\$6.24	\$5.86	\$4.90	\$5.26	\$5.19	\$5.13	\$4.52	
		COPAY / ALLOWANCE											
		\$0/\$50	\$0/\$75	\$0/\$100	\$0/\$150	\$0/175	\$0/\$200	\$10/\$50	\$10/\$75	\$10/\$100	\$10/\$150	\$10/175	\$10/\$200
d. Exam Plus Allowance													
	12/12 month benefit	4.45	5.45	6.47	10.12	12.30	14.48	4.04	5.05	6.07	9.49	11.54	13.59
	12/24 month benefit	3.44	3.95	4.45	6.58	7.92	9.25	3.05	3.54	4.04	5.98	7.19	8.40

THE GUARDIAN Life Insurance Company of America

Line 1A - Continued

DAVIS VISION STARTING RATES

a. Exam Plus	Copays					
	\$0	\$5	\$10	\$15	\$20	\$25
12 month	\$0.95	\$0.78	\$0.60	\$0.44	\$0.30	\$0.17
24 month	\$0.76	\$0.60	\$0.44	\$0.30	\$0.17	\$0.08

b. Exam Plus Allowance

12/12 - \$50	\$4.10	\$3.16	12/24 - \$50	\$3.66	\$2.82
12/12 - \$75	\$5.12	\$3.70	12/24 - \$75	\$4.58	\$3.30
12/12 - \$100	\$6.15	\$4.24	12/24 - \$100	\$5.50	\$3.79
12/12 - \$150	\$9.61	\$6.15	12/24 - \$150	\$8.76	\$5.61
12/12 - \$175	\$11.69	\$7.34	12/24 - \$175	\$10.73	\$6.74
12/12 - \$200	\$13.76	\$8.53	12/24 - \$200	\$12.70	\$7.88

DESIGNER

c. Materials Only	Copays					
	\$0	\$5	\$10	\$15	\$20	\$25
12/12	\$8.42	\$8.05	\$7.64	\$6.96	\$6.58	\$5.97
12/24	\$7.38	\$7.04	\$6.70	\$6.08	\$5.78	\$5.21
24/24	\$6.29	\$5.99	\$5.69	\$5.13	\$4.85	\$4.36

d. Exam/Lenses/Frames

12/12/12	\$11.87	\$11.50	\$11.11	\$10.36	\$9.98	\$9.24
12/12/24	\$9.15	\$8.84	\$8.55	\$7.96	\$7.67	\$7.12
12/24/24	\$7.80	\$7.54	\$7.29	\$6.77	\$6.52	\$6.00
24/24/24	\$5.95	\$5.76	\$5.56	\$5.13	\$4.96	\$4.55

e. Exam/Lenses/Frames	Split Copays					
	0/0	0/5	0/10	0/20	5/10	5/20
12/12/12	\$11.87	\$11.50	\$11.11	\$9.98	\$10.36	\$9.24
12/12/24	\$9.15	\$8.84	\$8.55	\$7.67	\$7.96	\$7.12
12/24/24	\$7.80	\$7.54	\$7.29	\$6.52	\$6.77	\$6.00
24/24/24	\$5.95	\$5.76	\$5.56	\$4.96	\$5.13	\$4.55

Exam/Lenses/Frames	10/10	10/15	10/20	10/25	15/25	20/20	25/25
12/12/12	\$9.98	\$9.43	\$8.89	\$7.54	\$7.25	\$7.25	\$5.99
12/12/24	\$7.67	\$7.25	\$6.83	\$5.77	\$5.53	\$5.53	\$4.55
12/24/24	\$6.52	\$6.16	\$5.80	\$4.82	\$4.62	\$4.62	\$3.76
24/24/24	\$4.96	\$4.67	\$4.38	\$3.58	\$3.44	\$3.44	\$2.76

PREMIER PLATINUM

f. Materials Only	Copays					
	\$0	\$5	\$10	\$15	\$20	\$25
12/12	\$13.13	\$12.75	\$12.34	\$11.53	\$11.15	\$10.38
12/24	\$11.51	\$11.17	\$10.83	\$10.10	\$9.78	\$9.07
24/24	\$9.86	\$9.56	\$9.24	\$8.59	\$8.28	\$7.66

g. Exam/Lenses/Frames

12/12/12	\$16.99	\$16.58	\$16.20	\$15.27	\$14.90	\$14.02
12/12/24	\$13.10	\$12.78	\$12.49	\$11.75	\$11.45	\$10.78
12/24/24	\$11.17	\$10.92	\$10.66	\$10.00	\$9.74	\$9.15
24/24/24	\$8.56	\$8.34	\$8.15	\$7.62	\$7.42	\$6.93

h. Exam/Lenses/Frames	Split Copays					
	0/0	0/5	0/10	0/20	5/10	5/20
12/12/12	\$16.99	\$16.58	\$16.20	\$14.90	\$15.27	\$14.02
12/12/24	\$13.10	\$12.78	\$12.49	\$11.45	\$11.75	\$10.78
12/24/24	\$11.17	\$10.92	\$10.66	\$9.74	\$10.00	\$9.15
24/24/24	\$8.56	\$8.34	\$8.15	\$7.42	\$7.62	\$6.93

Exam/Lenses/Frames	10/10	10/15	10/20	10/25	15/25	20/20	25/25
12/12/12	\$14.90	\$14.27	\$13.64	\$11.78	\$11.46	\$11.46	\$9.92
12/12/24	\$11.45	\$10.96	\$10.48	\$9.02	\$8.76	\$8.76	\$7.55
12/24/24	\$9.74	\$9.31	\$8.88	\$7.54	\$7.35	\$7.35	\$6.26
24/24/24	\$7.42	\$7.08	\$6.75	\$5.64	\$5.49	\$5.49	\$4.62

THE GUARDIAN Life Insurance Company of America

Line 1B - VISION AREA FACTORS

State	Area Factors		State	Area Factors	
	VSP	Davis		VSP	Davis
AK	1.372	1.216	MT	1.011	1.119
AL	1.077	1.006	NC	1.056	1.112
AR	0.974	1.211	ND	0.991	1.098
AZ	0.886	1.005	NE	1.036	1.166
CA	1.277	1.322	NH	0.845	1.198
CO	1.161	1.126	NJ	0.826	0.820
CT	0.801	0.941	NM	1.038	1.124
DC	1.019	0.945	NV	1.053	1.288
DE	0.867	0.849	NY	0.712	0.805
FL	0.774	0.953	OH	1.041	1.000
GA	1.021	1.046	OK	1.047	1.059
HI	1.251	1.343	OR	1.146	1.093
IA	1.121	0.963	PA	0.775	0.945
ID	1.077	1.119	RI	0.831	0.943
IL	0.915	0.937	SC	1.080	1.184
IN	1.159	1.107	SD	1.013	1.192
KS	1.056	1.039	TN	1.068	1.037
KY	0.931	0.988	TX	1.062	0.961
LA	0.861	0.916	UT	1.026	1.077
MA	0.804	0.943	VA	0.947	0.812
MD	0.949	1.023	VT	0.847	1.196
ME	0.831	1.196	WA	1.149	1.142
MI	1.158	1.060	WI	0.930	0.889
MN	1.058	1.081	WV	0.987	1.114
MO	1.070	1.026	WY	1.009	1.068
MS	0.969	1.091			

THE GUARDIAN Life Insurance Company of America

Line 4 - INDUSTRY FACTOR

Note: The X's in the numeric codes represent any single digit number. For example, SIC code 821x can be any four digit SIC code from 8210 to 8219.

<u>Industry</u>		<u>Factor</u>
Agriculture, Forestry, Fishing	01xx - 09xx	1.08
Mining	10xx - 14xx	1.08
Construction	15xx - 17xx	0.93
Manufacturing	20xx - 39xx	1.00
Transportation	40xx - 49xx	1.00
Wholesale Trade	50xx - 51xx	0.90
Retail Trade	52xx - 59xx	0.93
Banks and Insurance	60xx - 64xx, 67xx	0.97
Real Estate	65xx	1.00
Hotels and Lodging	70xx	0.93
Personal Service and Business Services	72xx - 73xx	0.87
Repair Services	75xx - 76xx	0.93
Motion Pictures and Recreational Services	78xx - 79xx	0.93
Health Services	80xx	0.90
Legal Services	81xx	0.87
School/Teachers	82xx	1.07
Social Services, Museums	83xx - 84xx	0.93
Membership Organizations	86xx	0.90
Engineering and Management Services	87xx	0.87
Other Services	88xx - 89xx	0.93
Public Administration	91xx - 97xx	1.10
Other	9999	1.10
Multiply the rate by this factor.		

Line 5 - RATE GUARANTEE PERIOD

I. Rate Guarantee

<u>Guarantee in Years</u>	<u>Factor</u>
1	1.000
2	1.025*
3	1.050*

Multiply the rate by this factor.

*Not available for less than 51 lives in Florida.

II. Renewal Caps

<u>Renewal Cap Percent Option</u>	<u>First Renewal Cap</u>	<u>First and Second Renewal Cap</u>
5.0%	1.010	1.020
5.5%	1.010	1.020
6.0%	1.010	1.020
6.5%	1.010	1.020
7.0%	1.005	1.010
7.5%	1.005	1.010
8.0%	1.005	1.010
8.5%	1.005	1.010
9.0%	1.005	1.010
9.5%	1.005	1.010
10.0%	1.000	1.000
10.5%	1.000	1.000
11.0%	1.000	1.000
11.5%	1.000	1.000
12.0%	1.000	1.000
12.5%	1.000	1.000
13.0%	1.000	1.000
13.5%	1.000	1.000
14.0%	1.000	1.000
14.5%	1.000	1.000
15.0%	1.000	1.000

THE GUARDIAN Life Insurance Company of America

Line 6 - PRIOR COVERAGE FACTORS

- a. Less than 10 employees Factor
1.00
- b. 10 or more employees

	<u>VSP</u>	FACTOR	<u>DAVIS</u>
<u>Prior Coverage</u>			
No	1.000		1.000
Yes, with Davis	0.980		.95
Yes, with VSP	0.950		.98
Yes, with other (non VSP, non Davis)	0.980		.98

Multiply the rate by this factor.

Line 7 - SECULAR TREND FACTOR

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>
11/1/12 - 12/31/12	1.0894	0.9886	0.9886

VSP - Increase factor by 0.01 for each succeeding three month period
 Davis - Increase factor by 0.00813 for each succeeding three month period

Line 7a - EXAM PLUS ALLOWANCE TREND

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>
11/1/12 - 12/31/12	1.0894	0.9886	0.9886

VSP - Increase factor by 0.01 for each succeeding three month period
 Davis - Increase factor by 0.00813 for each succeeding three month period

Line 7b - MATERIALS ONLY TREND

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>
11/1/12 - 12/31/12	N/A	0.9886	0.9886

Increase factor by 0.00813 for each succeeding three month period

Line 7c - EXAM PLUS TREND

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>
11/1/12 - 12/31/12	1.0894	0.9886	0.9886

VSP - Increase factor by 0.01 for each succeeding three month period
 Davis - Increase factor by 0.00813 for each succeeding three month period

THE GUARDIAN Life Insurance Company of America

Line 8 - PERCENTAGE PARTICIPATION FACTOR

	Percentage Participation					
	<u>25-34%</u>	<u>35-49%</u>	<u>50-64%</u>	<u>65-79%</u>	<u>80-99%</u>	<u>100%</u>
Non-contributory or 100% participation	N/A	N/A	N/A	N/A	N/A	1.00
Tied to Medical (Guardian or other)	1.00	1.00	1.00	1.00	1.00	1.00
Tied to Dental (Guardian or other)	1.20	1.12	1.07	1.03	1.00	1.00
Voluntary (w/o tie-in) (Employee pays 65% or more)	1.45	1.35	1.26	1.17	1.07	1.00
All Other	1.38	1.28	1.20	1.11	1.02	1.00

Note: The terms non-contributory, 100% participation, tied to medical, and tied to dental apply to both employees and dependents. "Tied to" implies that the same employees and dependents have both coverages.

Multiply the rate by this factor.

Line 9 - EXPENSES

1) Less than 10 employees

<u>Number of Employees</u>	<u>Factor</u>
1	1.67
2	1.60
3	1.57
4	1.545
5-9	1.48

2) 10 or more employees:

<u>Number of Employees</u>	<u>Sold with Guardian</u>		<u>3+ Other Non Medical</u>	<u>Other</u>	<u>Standalone</u>
	<u>Medical</u>	<u>Dental</u>			
10 - 49	1.47	1.54	1.76	1.85	N/A
50 - 99	1.41	1.47	1.76	1.85	1.85
100 - 249	1.34	1.43	1.59	1.67	1.67
250 - 499	1.29	1.36	1.46	1.54	1.54
500 - 999	1.24	1.30	1.36	1.43	1.43
1000 - 2499	1.24	1.25	1.28	1.35	1.35
2500 or more	1.24	1.25	1.24	1.30	1.30

If a vision plan is sold with both medical and dental coverage from the Guardian, the above medical factors take precedence.

Line 9a - SPECIAL EXPENSE FACTORS*

	<u>VSP</u>	<u>Davis</u>
Exam Plus	1.30	1.30
Exam plus Allowance	1.00	1.05
Materials Only	N/A	1.05

Multiply factor by the Expense Factor from Line 8

* For Exam Only or Exam Plus, multiply the above factors by 2.10 for less than 10 employees

THE GUARDIAN Life Insurance Company of America

Line 10 - LOADS FOR SPECIAL GROUPS

a. Less than 10 employees
Factor
 1.00

b. 10 or more employees:

<u>Group</u>	<u>Factor</u>
Senior populations (over age 65)	1.30
Retirees	1.30

Use the percentage of the group that falls into these categories to find the percentage of the load that should apply to the whole group. For example, if 10% of the group is in the senior population apply 10% of the 30% load (or 1.03) to the entire group.

Multiply the rate by this factor.

Line 11 - PLAN DESIGN FACTOR

A. VSP

Number of <u>Employees</u>	<u>Factor by Plan Design</u>						
	<u>Plan A</u>	<u>Plan B</u>	<u>Plan C</u>	<u>Plan D</u>	<u>EP</u>	<u>EPA</u>	<u>Enhanced B</u>
2-9	1.095	1.095	1.095	1.095	1.095	1.095	1.095
10-499	1	1	1	1	1	1	1
500 or more	1.0286	1.0286	1.0286	1.0286	1.0286	1.0286	1.0286

Multiply the rate by the appropriate factor above

B. DAVIS

Number of Employees	<u>Factor by Plan Design</u>								
	<u>Plan A</u>	<u>Plan B</u>	<u>Plan C</u>	<u>Plan D</u>	<u>Exam Plus</u>	<u>EP</u>	<u>EPA</u>	<u>MO</u>	
2-9	1.104	1.104	1.104	1.104	1.104	1.104	1.104	1.104	
10-499	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	
500+	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	

Line 12 - OUT-OF-NET SCHEDULE OPTIONS

	<u>Factor</u>
Schedule H	1.000
Schedule I	1.000
Schedule J	1.002
Schedule K	1.003
Schedule P	0.986

Line 13 - DEPENDENT AGE LIMITS (FOR FUTURE USE)

Multiply the rate by 1.00

THE GUARDIAN Life Insurance Company of America

Line 97 - EMPLOYEE AND SPLIT DEPENDENT FACTORS

Multiply the above rate by these factors to determine the employee rate and split dependent rates

<u>a. 4-tier rate structure</u>	<u>Factor</u>
Employee Only	0.60
Spouse Only	0.41
Child(ren) Only	0.43
Spouse + Child(ren)	1.03

<u>b. 3-tier rate structure</u>	
Employee Only	0.60
1 Dependent	0.31
2 or more Dependents	1.00

<u>c. 2-tier rate structure (Composite)</u>	
Employee Only	0.60
Dependent(s)	0.69

Line 996 - BENEFIT PACKAGES FOR THE SMALL BUSINESS

Note: The discounts listed below will only apply by meeting specific underwriting criteria and packaged benefit designs.

a. 2-9 lives

<u>Number of Coverages</u>	<u>Factor</u>
2	0.96
3	0.95
4	0.94
5	0.93
6+	0.92

b. 10-24 Lives

<u>Number of Coverages</u>	<u>Factor</u>
2	0.92
3	0.91
4	0.90
5	0.89
6+	0.88

SERFF Tracking #:

GARD-128912291

State Tracking #:

Company Tracking #:

State:

District of Columbia

Filing Company:

The Guardian Life Insurance Company of America

TOI/Sub-TOI:

H20G Group Health - Vision/H20G.000 Health - Vision

Product Name:

6/1/2013 Washington, DC Vision Filing

Project Name/Number:

/

Supporting Document Schedules

Satisfied - Item:	Cover Letter All Filings
Comments:	
Attachment(s):	Cover - Vision 201306 - DC.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Certificate of Authority to File
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Memorandum
Comments:	Please see attached revised actuarial memorandum and response to objection letter
Attachment(s):	ACTMEMO - Vision 201306 - DC 2.pdf Response 6-1-2013 DC Vision filing GARD-128912291.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	Cover - Vision 201306 - DC.pdf ACTCERT - Vision 201306 - DC.pdf ACTMEMO - Vision 201306 - DC (Revised).pdf
Item Status:	
Status Date:	

Bypassed - Item:	District of Columbia and Countrywide Loss Ratio Analysis (P&C)
Bypass Reason:	N/A
Attachment(s):	

SERFF Tracking #:

GARD-128912291

State Tracking #:

Company Tracking #:

State:

District of Columbia

Filing Company:

The Guardian Life Insurance Company of America

TOI/Sub-TOI:

H20G Group Health - Vision/H20G.000 Health - Vision

Product Name:

6/1/2013 Washington, DC Vision Filing

Project Name/Number:

/

Item Status:	
Status Date:	

Bypassed - Item:	District of Columbia and Countrywide Experience for the Last 5 Years (P&C)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Rate Summary Worksheet
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Experience
Comments:	
Attachment(s):	Experience - Vision 201306 - DC.pdf
Item Status:	
Status Date:	



February 25, 2013

Mr. Laszlo Pentek
Actuary
Government of the District of Columbia
Department of Insurance, Securities and Banking
810 First Street, NE, #701
Washington, DC, 20002

Re: Group Vision Rate Filing

Carrier: The Guardian Life Insurance Company of America
NAIC Company Code: 64246

Dear Mr. Pentek:

Enclosed are the latest changes to Guardian's Group Vision rate manual with rate changes for 6/1/2013 or later upon approval of this filing. The requested changes result in a 0.50% decrease to our aggregate rate level.

The SERFF number of our last approved Vision filing is GARD-128739418

As of 9/30/2012, The Guardian provides vision insurance for 78 groups located in the District of Columbia, with a total of 7,851 lives.

Sincerely,

David Ferrari, FSA, MAAA
Assistant Actuary
Group Products
3900 Burgess Place, Mail Station 2E
Bethlehem, PA 18017
610.807.8026

2/25/2013
Date



ACTUARIAL MEMORANDUM

A. Description of Benefits

The Guardian has one class of business. In addition to benefit plan design, Guardian's Group Vision rates are adjusted based on industry, family composition, geographical area, and group size (lives and premium). There is no limit to the issue age range. The rating area is based on the state of the employer and the industry factors are based on the SIC code of the employer. We currently utilize a four-tier rate structure (Employee; Employee and Spouse; Employee and Child(ren); Employee, Spouse and Child(ren)).

Currently, Guardian's Group Vision rate manual can be used to calculate rates for a wide variety of Vision benefit plan designs for groups of 2 or more employees. Plan design options include varying levels of coverage for service and materials, with the choice of split or single copays. Our complete rate manual has been attached, along with a sample rate calculation.

B. Renewability Provision

Each case's rates are reviewed for renewal action on an annual basis. Renewal rate cap and 2-year rate guarantee options are also available.

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Guardian's Vision business is an open block.

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Guardian's Vision business is marketed through both our field force of agents and general agents as well as by brokers.

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Underwriting is at the group level. Group characteristics and prior experience determine the level of underwriting. The plan holder's rates may be modified by underwriting review.

F. Issue Age Limits

There is no limit to the issue age range, and the premiums are determined on an attained age basis, since they change each year as the case renews.

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Rates are developed separately for "employee" and "dependent" categories. These categories are then split into "tier" rates based on factors that were developed using internal company data.



H. Nature of Rate Change and Proposed Rate/Methodology Change

Below is a summary of the proposed Vision rate manual change(s) to be effective on June 1, 2013 or later upon approval:

We will be implementing two major changes to our Vision manual rate calculations:

1. We are eliminating the separate rate calculations for groups of 10 or more and less than 10. The less than 10 calculation is being eliminated. Factor tables for the 10 or more rate calculation are being expanded where necessary to handle groups of less than 10.
2. We are eliminating separate base rates for each state. We are replacing these with a nationwide set of base rates and adding a set of Area factors by state that will be applied to the national bases rates.

The following is a line by line description of the changes being requested:

Line 1 – Base Rates. State specific base rates are being eliminated. They are being replaced by a nationwide set of bases rates which will now be Line 1A of the rate calculation (rate page VC -1-DC for VSP and page VC-2-DC for Davis) and a set of Area factors that will be Line 1B of the rate calculation (VC-3-DC) with separate factors for VSP and Davis. Area factors were derived so that there would be no aggregate rate impact at the state level due to these changes. There is no overall rate impact.

Line 4 – Industry factors (VC-30-DC).

1. We are requesting a 3% increase for the following SIC codes: 01xx-09xx, 10xx-14xx, 15xx-17xx, 52xx-59xx, 70xx, 75xx-76xx, 78xx-79xx, 83xx-84xx and 88xx-89xx.
2. We are requesting a 3% decrease in rate for the following SIC codes: 60xx-64xx, 67xx, 72xx-73xx, 81xx, 82xx and 87xx.

The overall effect of these changes is a 0.5% decrease in rates.

Line 6 – Prior Coverage Factors (VC-31-DC). No change in factors. The table is being expanded using the existing factors for groups of less than 10.

Line 7 – Secular Trend Factors (VC-31-DC). No change in factors. However, less than 10 groups will now be quoted using the trend factors for 10 or more groups. A set of factors for 2-9 are being added to the Line 11 – Plan Design Factor table (see below). These factors are being set so that in combination with the change in Secular Trend factors, there is no overall change in rate for groups of less than 10.

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Line 13 – Dependent Age Limits (VC-33-DC). This is a new line in the rate calculation that is being added for future use. The factor for all groups is 1.000.

Line 996 – Benefit Packages for the Small Business (VC-34-DC). No change in factors. The table is being expanded using the existing factors for groups of less than 10.

The combined effect of these changes is a 0.5% decrease to Vision rates.

These changes are based on an analysis of internal company data using a pricing trend assumption of 4.0% for VSP and 3.25% for Davis.

I. Indication if New or Modified

This is a new filing for the District of Columbia

J. Comparison to Status Quo

These changes result in a -0.50% aggregate change to DC premium vision rates.

K. Summary of How Each Proposed Modification Differs from Corresponding Current/Approved Rate/Methodology

Please see section H above.

L. Summary of Each Proposed New Rule

We are not requesting any rule changes.

M. Overall Premium Impact of Filing on DC Policy holders

These changes result in a \$4,390 aggregate decrease to DC premium rates.



N. Rate Change History

Date	VSP % Change	Davis % Change
3/1/2010	0.000%	0.000%
8/1/2010	-4.700%	3.100%
11/1/2010	0.750%	0.750%
2010 Total:	-3.985%	3.873%
2/1/2011	0.750%	0.750%
3/1/2011	0.080%	-7.830%
4/1/2011	1.000%	0.625%
7/1/2011	1.000%	0.625%
10/1/2011	-2.900%	-0.600%
2011 Total:	-0.126%	-6.538%
1/1/2012	1.000%	0.625%
4/1/2012	1.000%	0.625%
7/1/2012	1.000%	0.625%
10/1/2012	1.000%	0.625%
11/1/2012	1.200%	1.880%
2012 Total:	5.309%	0.000%
1/1/2013	1.000%	0.813%
2/1/2013	-1.000%	-1.000%
4/1/2013	1.000%	0.813%
6/1/2013	-0.500%	-0.500%

O. Filed Minimum Required Loss Ratio

Guardian's Group Vision manually rated business is priced with an expected loss ratio of 61.5%. The remaining 38.5% is intended to provide for expenses and profit. This assumes case sizes of 2-499, which is the majority of the business receiving manual rates. Below is the breakdown of the expense assumptions:

16.6%



Sales and Commissions	
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Profit	5.0%
Total	38.5%

P. Interest Rate Assumptions

We do not have interest rate assumption due to the short-term nature of the Vision product.

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The annual trend assumption utilized in pricing is 4.0% for VSP business, and 3.25% for Davis. This reflects our best estimate of our long term claim cost trend.

R. Persistency

The Guardian's product is an annually renewable term product and therefore no persistency assumption is incorporated into the pricing.

S. Actuarial Certification

Please see the attached certification.

Matthew Sachse, ASA, MAAA
Pricing Manager
Group Products

4/5/2013
Date



April 5, 2013

Darnice Shirley
Government of the District of Columbia
Department of Insurance, Securities and Banking
810 First Street, NE, #701
Washington, DC, 20002

Re: Response – Objection Letter for GARD-128912291
Carrier: The Guardian Life Insurance Company of America
NAIC Company Code: 64246

Dear Darnice Shirley:

This letter is in response to your objection letter dated 3/19/2013 concerning the above filing.

1. As requested, the attached revised Actuarial Memorandum now includes a history of rates changes for DC.
2. The distribution of rate changes has two components. The first component was the change in Industry factors. Some industry factors were increased by 3% and some were decreased by 3% with an aggregate affect of -0.5%. The second component was the change to a Base Rate/Area Factor rate structure and the elimination of the separate <10 rate calc as discussed in the Actuarial Memorandum. While this second component was rate neutral in aggregate, there is a range of rate effects at the plan type level. This accounts for the additional variation that resulted in the -11.7% to 11.8% range.

If you have any questions, feel free to call me at (610) 807-6446 or e-mail me at Matthew_Sachse@glic.com.

Matthew Sachse, ASA, MAAA
Pricing Manager
Group Products

4/5/2013
Date



February 25, 2013

Mr. Laszlo Pentek
Actuary
Government of the District of Columbia
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Assistant Actuary
Group Products
3900 Burgess Place, Mail Station 2E
Bethlehem, PA 18017
610.807.8026

2/25/2013
Date



ACTUARIAL CERTIFICATION

In my opinion the premium rates and rating methodology to which this certification applies are neither excessive, inadequate, nor unfairly discriminatory, and they meet the requirements of the insurance laws and regulations of the District of Columbia.

David Ferrari

David Ferrari, FSA, MAAA
Assistant Actuary
Group Products

2/25/2013

Date



ACTUARIAL MEMORANDUM

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Please see section H above.

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We are not requesting any rule changes.

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N. Filed Minimum Required Loss Ratio

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Sales and Commissions	16.6%
Administration	14.1%
Premium Tax	2.8%
Profit	5.0%
Total	38.5%

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We do not have interest rate assumption due to the short-term nature of the Vision product.

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R. Actuarial Certification

Please see the attached certification.

DC - VSP	Period: 10/1/11 - 9/30/12				State Rate Filing Data	
CaseSize	Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9	15	69	\$13,275	\$5,433	40.9%	
10-15	8	95	\$15,746	\$8,398	53.3%	
16-49	29	878	\$141,802	\$65,880	46.5%	
50-99	12	795	\$124,140	\$67,060	54.0%	
100-249	3	532	\$79,297	\$37,968	47.9%	
250+	3	4,260	\$575,752	\$533,449	92.7%	
Grand Total	69	6,627	\$950,012	\$718,188	75.6%	

DC - Davis	Period: 10/1/11 - 9/30/12				State Rate Filing Data	
CaseSize	Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
16-49	3	80	\$7,724	\$2,251	29.1%	
50-99	3	248	\$23,861	\$12,424	52.1%	
100-249	2	219	\$17,546	\$8,133	46.4%	
250+	1	678	\$43,135	\$19,689	45.6%	
Grand Total	9	1,225	\$92,266	\$42,498	46.1%	

Nationwide - VSP	Period: 10/1/11 - 9/30/12				State Rate Filing Data	
CaseSize	Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9	5,324	26,751	\$4,378,132	\$2,478,521	56.6%	
10-15	2,197	27,044	\$4,112,352	\$2,355,296	57.3%	
16-49	4,913	139,082	\$21,384,287	\$12,926,120	60.4%	
50-99	1,841	126,193	\$18,283,643	\$11,931,353	65.3%	
100-249	1,098	162,796	\$23,179,492	\$16,001,369	69.0%	
250+	366	190,270	\$23,964,740	\$17,097,731	71.3%	
Grand Total	15,739	672,136	\$95,302,645	\$62,790,390	65.9%	

Nationwide - Davis	Period: 10/1/11 - 9/30/12				State Rate Filing Data	
CaseSize	Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9	1,345	7,012	\$804,867	\$480,729	59.7%	
10-15	769	9,616	\$1,110,356	\$672,793	60.6%	
16-49	1,848	53,322	\$6,163,505	\$3,643,503	59.1%	
50-99	774	52,962	\$6,103,083	\$3,901,386	63.9%	
100-249	418	59,425	\$6,735,136	\$4,374,608	65.0%	

State: District of Columbia**Filing Company:**

The Guardian Life Insurance Company of America

TOI/Sub-TOI: H20G Group Health - Vision/H20G.000 Health - Vision**Product Name:** 6/1/2013 Washington, DC Vision Filing**Project Name/Number:** /

Superseded Schedule Items

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

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
02/26/2013		Supporting Document	Actuarial Memorandum	04/05/2013	ACTMEMO - Vision 201306 - DC (Revised).pdf (Superseded)
02/25/2013		Supporting Document	Actuarial Memorandum	02/26/2013	ACTMEMO - Vision 201306 - DC.pdf (Superseded)
02/25/2013		Supporting Document	Actuarial Justification	02/26/2013	Cover - Vision 201306 - DC.pdf ACTCERT - Vision 201306 - DC.pdf ACTMEMO - Vision 201306 - DC.pdf (Superseded)



ACTUARIAL MEMORANDUM

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1. We are eliminating the separate rate calculations for groups of 10 or more and less than 10. The less than 10 calculation is being eliminated. Factor tables for the 10 or more rate calculation are being expanded where necessary to handle groups of less than 10.
2. We are eliminating separate base rates for each state. We are replacing these with a nationwide set of base rates and adding a set of Area factors by state that will be applied to the national bases rates.

The following is a line by line description of the changes being requested:

Line 1 – Base Rates. State specific base rates are being eliminated. They are being replaced by a nationwide set of bases rates which will now be Line 1A of the rate calculation (rate page VC -1-DC for VSP and page VC-2-DC for Davis) and a set of Area factors that will be Line 1B of the rate calculation (VC-3-DC) with separate factors for VSP and Davis. Area factors were derived so that there would be no aggregate rate impact at the state level due to these changes. There is no overall rate impact.

Line 4 – Industry factors (VC-30-DC).

1. We are requesting a 3% increase for the following SIC codes: 01xx-09xx, 10xx-14xx, 15xx-17xx, 52xx-59xx, 70xx, 75xx-76xx, 78xx-79xx, 83xx-84xx and 88xx-89xx.
2. We are requesting a 3% decrease in rate for the following SIC codes: 60xx-64xx, 67xx, 72xx-73xx, 81xx, 82xx and 87xx.

The overall effect of these changes is a 0.5% decrease in rates.

Line 6 – Prior Coverage Factors (VC-31-DC). No change in factors. The table is being expanded using the existing factors for groups of less than 10.

Line 7 – Secular Trend Factors (VC-31-DC). No change in factors. However, less than 10 groups will now be quoted using the trend factors for 10 or more groups. A set of factors for 2-9 are being added to the Line 11 – Plan Design Factor table (see below). These factors are being set so that in combination with the change in Secular Trend factors, there is no overall change in rate for groups of less than 10.

Line 9 – Expenses (VC-32-DC). No change in factors. The table is being expanded using the existing factors for groups of less than 10.

Line 10 – Loads for Special Groups (VC-33-DC). No change in factors. The table is being



expanded using the existing factors for groups of less than 10.

Line 11 – Plan Design Factors (VC-33-DC). New factors are being added for groups of less than 10. These factors were set so that in combination with the change in Secular Trend factors for groups of less than 10 (see above), there is no overall change in rates for groups of less than 10.

Line 13 – Dependent Age Limits (VC-33-DC). This is a new line in the rate calculation that is being added for future use. The factor for all groups is 1.000.

Line 996 – Benefit Packages for the Small Business (VC-34-DC). No change in factors. The table is being expanded using the existing factors for groups of less than 10.

The combined effect of these changes is a 0.5% decrease to Vision rates.

These changes are based on an analysis of internal company data using a pricing trend assumption of 4.0% for VSP and 3.25% for Davis.

I. Indication if New or Modified

This is a new filing for the District of Columbia

J. Comparison to Status Quo

These changes result in a -0.50% aggregate change to DC premium vision rates.

K. Summary of How Each Proposed Modification Differs from Corresponding Current/Approved Rate/Methodology

Please see section H above.

L. Summary of Each Proposed New Rule

We are not requesting any rule changes.

M. Overall Premium Impact of Filing on DC Policy holders

These changes result in a \$4,390 aggregate decrease to DC premium rates.

N. Filed Minimum Required Loss Ratio

Guardian's Group Vision manually rated business is priced with an expected loss ratio of 61.5%. The remaining 39.5% is intended to provide for expenses and profit. This assumes case sizes of 2-499, which is the majority of the business receiving manual rates. Below is the breakdown of the expense assumptions:



Sales and Commissions	16.6%
Administration	14.1%
Premium Tax	2.8%
Profit	5.0%
Total	39.5%

O. Interest Rate Assumptions

We do not have interest rate assumption due to the short-term nature of the Vision product.

P. Trend Assumptions

The annual trend assumption utilized in pricing is 4.0% for VSP business, and 3.25% for Davis. This reflects our best estimate of our long term claim cost trend.

Q. Persistency

The Guardian's product is an annually renewable term product and therefore no persistency assumption is incorporated into the pricing.

R. Actuarial Certification

Please see the attached certification.



ACTUARIAL MEMORANDUM

A. Description of Benefits

The Guardian has one class of business. In addition to benefit plan design, Guardian's Group Vision rates are adjusted based on industry, family composition, geographical area, and group size (lives and premium). There is no limit to the issue age range. The rating area is based on the state of the employer and the industry factors are based on the SIC code of the employer. We currently utilize a four-tier rate structure (Employee; Employee and Spouse; Employee and Child(ren); Employee, Spouse and Child(ren)).

Currently, Guardian's Group Vision rate manual can be used to calculate rates for a wide variety of Vision benefit plan designs for groups of 2 or more employees. Plan design options include varying levels of coverage for service and materials, with the choice of split or single copays. Our complete rate manual has been attached, along with a sample rate calculation.

B. Renewability Provision

Each case's rates are reviewed for renewal action on an annual basis. Renewal rate cap and 2-year rate guarantee options are also available.

C. Applicability (Closed/Open Block)

Guardian's Vision business is an open block.

D. Marketing Method

Guardian's Vision business is marketed through both our field force of agents and general agents as well as by brokers.

E. Underwriting Method

Underwriting is at the group level. Group characteristics and prior experience determine the level of underwriting. The plan holder's rates may be modified by underwriting review.

F. Issue Age Limits

There is no limit to the issue age range, and the premiums are determined on an attained age basis, since they change each year as the case renews.

G. Premium Basis

Rates are developed separately for "employee" and "dependent" categories. These categories are then split into "tier" rates based on factors that were developed using internal company data.



H. Nature of Rate Change and Proposed Rate/Methodology Change

Below is a summary of the proposed Vision rate manual change(s) to be effective on June 1, 2013 or later upon approval:

We will be implementing two major changes to our Vision manual rate calculations:

1. We are eliminating the separate rate calculations for groups of 10 or more and less than 10. The less than 10 calculation is being eliminated. Factor tables for the 10 or more rate calculation are being expanded where necessary to handle groups of less than 10.
2. We are eliminating separate base rates for each state. We are replacing these with a nationwide set of base rates and adding a set of Area factors by state that will be applied to the national bases rates.

The following is a line by line description of the changes being requested:

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These changes are based on an analysis of internal company data using a pricing trend assumption of 4.0% for VSP and 3.25% for Davis.

I. Indication if New or Modified

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K. Summary of How Each Proposed Modification Differs from Corresponding Current/Approved Rate/Methodology

Please see section H above.

L. Summary of Each Proposed New Rule

We are not requesting any rule changes.

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N. Filed Minimum Required Loss Ratio

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