

INS CONSULTANTS, INC.

Insurance Regulatory Consultants

419 S. 2nd Street New Market, Suite 206 Philadelphia, PA 19147 Phone: (215) 625-9877

Fax: (215) 627-7104

January 31, 2014

Evelyn Melton Department of Administration Purchasing Division 2019 Washington Street East Charleston, WV 25305-0130

Buyer:

Evelyn Melton

RFQ No.:

INS14014

Bid Opening Date:

February 4, 2014

Bid Opening Time:

1:30 P.M.

Dear Ms. Melton:

INS Consultants, Inc. (INS) is pleased to submit a cost proposal in response to RFQ No. INS14014 for Actuarial Services. INS is uniquely qualified to provide actuarial services to assist the West Virginia Offices of the Insurance Commissioner (OIC).

INS is well qualified to serve the OIC, and has been providing actuarial expertise to insurance regulators for over twenty years.

INS appreciates the opportunity to submit this proposal. Please do not hesitate to contact me with any questions at (215) 625-9877.

Sincerely,

Alan E. Shaw, ASA, MAAA

Executive Vice President

02/04/14 09:06:58AM West Virginia Purchasing Division

AES:ald Enclosures

EXHIBIT A

REQUEST FOR QUOTATION INS14014

Actuarial Rate Review of Life and Health Related Product Filings and Consulting Services

tem#	Year:	Description:	Hours:	Unit Price:	Extended Price:	Total:
1	1	Actuarial Rate Review of Life and Health product filings and consulting services.	1000	\$_190.00	\$\$	\$ 190,000.00
2	2 (1st Renewal)	Actuarial Rate Review of Life and Health product filings and consulting services.	1000	\$ 190.00	<u>\$</u>	\$ 190,000.00
3	3 (2nd Renewal)	Actuarial Rate Review of Life and Health product filings and consulting services.	1000	\$ 190.00	\$	\$_190,000.00
				Overall Total Price>		\$ 570,000.00

Note: Quantities (hours) listed above are estimates and are for evaluation purposes only. Actual need is not guaranteed or implied.

Vendor must submit an all-inclusive hourly rate for the required services which includes travel and related expenses, including supplies and general administrative expenses.

Award will be made to the responsible bidder meeting specifications with the lowest Overall Total Price.

Vendor Name: INS Consultants, Inc.

Address: 419 S. 2nd Street

New Market, Suite 206

Philadelphia, PA 19147

E-Mail: AShaw@insconsultants.org

Fax#: (215) 625-4926

Phone# (215) 625-9877

Signature: Ola & Sha



Insurance Regulatory Consultants

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Dear Ms. Melton:

INS Consultants, Inc. (INS) is pleased to submit a proposal in response to RFQ No. INS14014 for Actuarial Services. INS is uniquely qualified to provide actuarial services to assist the West Virginia Offices of the Insurance Commissioner (OIC).

The accompanying response contains information that we hope will be of assistance to you in formulating a decision on the selection and appointment of INS to provide actuarial services to the OIC.

INS is well qualified to serve the OIC, and has been providing actuarial expertise to insurance regulators for over twenty years.

INS appreciates the opportunity to submit this proposal. Please do not hesitate to contact me with any questions at (215) 625-9877.

Sincerely,

Alan E. Shaw, ASA, MAAA Executive Vice President

AES:ald Enclosures

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State of West Virginia
Department of Administration
Purchasing Division
2019 Washington Street East Post Office Box 50130 Charleston, WV 25305-0130

215-265-9877

Solicitation

NUMBER INS14014

PAGE 1

ADDRESS CORRESPONDENCE TO ATTENTION OF:

EVELYN MELTON 304-558-2306

INSURANCE COMMISSION

70 1124 SMITH STREET CHARLESTON, WV 25305-0540

304-558-3707

INS CONSULTANTS INC 419 S 2ND STREET SUITE 206 NEW MARKET PHILADELPHIA PA 19147

		/2014	CAT.			NING TIME		
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	***** THI	s Is TH	E END	OF RFQ	INS14014	***** TOI	'AL:	

CERTIFICATION AND SIGNATURE PAGE

By signing below, I certify that I have reviewed this Solicitation in its entirety, understand the requirements, terms and conditions, and other information contained herein; that I am submitting this bid or proposal for review and consideration; that I am authorized by the bidder to execute this bid or any documents related thereto on bidder's behalf; that I am authorized to bind the bidder in a contractual relationship; and that to the best of my knowledge, the bidder has properly registered with any State agency that may require registration.

INS Consultants, Inc.
(Company)
ale E. Sha
(Authorized Signature)
Alan E. Shaw, Executive Vice Presider
(Representative Name, Title)
(215) 625-9877 (215) 625-492
(Phone Number) (Fax Number)
January 31, 2014
(Date)

ADDENDUM ACKNOWLEDGEMENT FORM SOLICITATION NO.: INS14014

Instructions: Please acknowledge receipt of all addenda issued with this solicitation by completing this addendum acknowledgment form. Check the box next to each addendum received and sign below. Failure to acknowledge addenda may result in bid disqualification.

Acknowledgment: I hereby acknowledge receipt of the following addenda and have made the necessary revisions to my proposal, plans and/or specification, etc.

	Numbers Received: ox next to each addendum rece	eived)				
	Addendum No. 1		Addendum No. 6			
	Addendum No. 2		Addendum No. 7			
	Addendum No. 3		Addendum No. 8			
	Addendum No. 4		Addendum No. 9			
	Addendum No. 5		Addendum No. 10			
I understand that failure to confirm the receipt of addenda may be cause for rejection of this bid. I further understand that any verbal representation made or assumed to be made during any oral discussion held between Vendor's representatives and any state personnel is not binding. Only the information issued in writing and added to the specifications by an official addendum is binding.						
		INS	Consultants, Inc.			
			Company			
			Authorized Signature			
		Jan	uary 31, 2014			
			Date			

NOTE: This addendum acknowledgement should be submitted with the bid to expedite document processing.

Purchasing Affidavit (Revised 07/01/2012)

STATE OF WEST VIRGINIA Purchasing Division

PURCHASING AFFIDAVIT

MANDATE: Under W. Va. Code §5A-3-10a, no contract or renewal of any contract may be awarded by the state or any of its political subdivisions to any vendor or prospective vendor when the vendor or prospective vendor or a related party to the vendor or prospective vendor is a debtor and: (1) the debt owed is an amount greater than one thousand dollars in the aggregate; or (2) the debtor is in employer default.

EXCEPTION: The prohibition listed above does not apply where a vendor has contested any tax administered pursuant to chapter eleven of the W. Va. Code, workers' compensation premium, permit fee or environmental fee or assessment and the matter has not become final or where the vendor has entered into a payment plan or agreement and the vendor is not in default of any of the provisions of such plan or agreement.

DEFINITIONS:

WITNESS THE FOLLOWING SIGNATURE:

"Debt" means any assessment, premium, penalty, fine, tax or other amount of money owed to the state or any of its political subdivisions because of a judgment, fine, permit violation, license assessment, defaulted workers' compensation premium, penalty or other assessment presently delinquent or due and required to be paid to the state or any of its political subdivisions, including any interest or additional penalties accrued thereon.

"Employer default" means having an outstanding balance or liability to the old fund or to the uninsured employers' fund or being in policy default, as defined in W. Va. Code § 23-2c-2, failure to maintain mandatory workers' compensation coverage, or failure to fully meet its obligations as a workers' compensation self-insured employer. An employer is not in employer default if it has entered into a repayment agreement with the Insurance Commissioner and remains in compliance with the obligations under the repayment agreement.

"Related party" means a party, whether an individual, corporation, partnership, association, limited liability company or any other form or business association or other entity whatsoever, related to any vendor by blood, marriage, ownership or contract through which the party has a relationship of ownership or other interest with the vendor so that the party will actually or by effect receive or control a portion of the benefit, profit or other consideration from performance of a vendor contract with the party receiving an amount that meets or exceed five percent of the total contract amount.

AFFIRMATION: By signing this form, the vendor's authorized signer affirms and acknowledges under penalty of law for false swearing (*W. Va. Code* §61-5-3) that neither vendor nor any related party owe a debt as defined above and that neither vendor nor any related party are in employer default as defined above, unless the debt or employer default is permitted under the exception above.

Vendor's Name: INS	Consultants, Inc.			
Authorized Signature:	ala E Sha	Date: January 31, 2014		
State of Pennsylvan	iia			
County of Philadelphia	to-wit:			
Taken, subscribed, and s	worn to before me this 31 day of January	, 20_14.		
My Commission expires	NOTARIAL SEAL	11		
AFFIX SEAL HERE	CUDICTINE A HACCEDTY ALARES DELLE	Mutu a Thyank		

State of West Virginia

VENDOR PREFERENCE CERTIFICATE

Certification and application* is hereby made for Preference in accordance with **West Virginia Code**, §5A-3-37. (Does not apply to construction contracts). **West Virginia Code**, §5A-3-37, provides an opportunity for qualifying vendors to request (at the time of bid) preference for their residency status. Such preference is an evaluation method only and will be applied only to the cost bid in accordance with the **West Virginia Code**. This certificate for application is to be used to request such preference. The Purchasing Division will make the determination of the Resident Vendor Preference, if applicable.

	Bidder is an individual resident vendor and has resident the date of this certification; or.	ed continuously in West Virginia for four (4) years immediately preced-		
_	Bidder is a partnership, association or corporation results business continuously in West Virginia for four (4) you ownership interest of Bidder is held by another indivimaintained its headquarters or principal place of b preceding the date of this certification; or, Bidder is a nonresident vendor which has an affiliate of	sident vendor and has maintained its headquarters or principal place of ears immediately preceding the date of this certification; or 80% of the dual, partnership, association or corporation resident vendor who has usiness continuously in West Virginia for four (4) years immediately or subsidiary which employs a minimum of one hundred state residents pal place of business within West Virginia continuously for the four (4) action: or		
2.	Application is made for 2.5% resident vendor p			
_	Bidder is a resident vendor who certifies that, durin	ng the life of the contract, on average at least 75% of the employees st Virginia who have resided in the state continuously for the two years		
3.	affiliate or subsidiary which maintains its headquar minimum of one hundred state residents who certifi	um of one hundred state residents or is a nonresident vendor with an ters or principal place of business within West Virginia employing a les that, during the life of the contract, on average at least 75% of the ployees are residents of West Virginia who have resided in the state		
4.	Application is made for 5% resident vendor preference for the reason checked: Bidder meets either the requirement of both subdivisions (1) and (2) or subdivision (1) and (3) as stated above; or,			
5.	Application is made for 3.5% resident vendor preference who is a veteran for the reason checked: Bidder is an individual resident vendor who is a veteran of the United States armed forces, the reserves or the National Guard and has resided in West Virginia continuously for the four years immediately preceding the date on which the bid is submitted; or,			
6.	Bidder is a resident vendor who is a veteran of the l purposes of producing or distributing the commoditie continuously over the entire term of the project, on	reference who is a veteran for the reason checked: United States armed forces, the reserves or the National Guard, if, for its or completing the project which is the subject of the vendor's bid and average at least seventy-five percent of the vendor's employees are state continuously for the two immediately preceding years.		
7.	dance with West Virginia Code §5A-3-59 and W	esident small, women- and minority-owned business, in accor- lest Virginia Code of State Rules. Contract award by the Purchasing Division as a certified small, women-		
require agains	er understands if the Secretary of Revenue determines rements for such preference, the Secretary may order t	that a Bidder receiving preference has failed to continue to meet the he Director of Purchasing to: (a) reject the bid; or (b) assess a penalty d amount and that such penalty will be paid to the contracting agency hase order.		
authori	orizes the Department of Revenue to disclose to the Direct	any reasonably requested information to the Purchasing Division and ctor of Purchasing appropriate information verifying that Bidder has paid does not contain the amounts of taxes paid nor any other information		
and ad	accurate in all respects; and that if a contract is is	code, §61-5-3), Bidder hereby certifies that this certificate is true sued to Bidder and if anything contained within this certificate tify the Purchasing Division in writing immediately.		
Bidde	er: INS Consultants, Inc.	Signed: AL & Sha		
	January 31, 2014	Title: Executive Vice President		

REQUEST FOR QUOTATION INS14014

Actuarial Rate Review of Life and Health Related Product Filings and Consulting Services

10. VENDOR DEFAULT:

- 10.1. The following shall be considered a vendor default under this Contract.
 - 10.1.1. Failure to perform Contract Services in accordance with the requirements contained herein.
 - 10.1.2. Failure to comply with other specifications and requirements contained herein.
 - 10.1.3. Failure to comply with any laws, rules, and ordinances applicable to the Contract Services provided under this Contract.
 - 10.1.4. Failure to remedy deficient performance upon request.
- 10.2. The following remedies shall be available to Agency upon default.
 - 10.2.1. Cancellation of the Contract.
 - 10.2.2. Cancellation of one or more release orders issued under this Contract.
 - 10.2.3. Any other remedies available in equity.

11. MISCELLANEOUS:

11.1. Contract Manager: During its performance of this Contract, Vendor must designate and maintain a primary contract manager responsible for overseeing Vendor's responsibilities under this Contract. The Contract manager must be available during normal business hours to address any customer service or other issues related to this Contract. Vendor should list its Contract manager and his or her contact information below.

Contract Manager: Alan E. Shaw, ASA, MAAA

Telephone Number: (215) 625-9877

Fax Number: (215) 625-4926

Email Address: AShaw@insconsultants.org

Background

INS Consultants, Inc. (INS) and its related companies, INS Regulatory Insurance Services, Inc., INS Services, Inc., and INSRIS-PR, LLC (collectively The INS Companies) are a regulatory consulting group consisting of a large, highly qualified and mobile national network of over one hundred thirty-five (135) regulatory professionals who have been exclusively assisting insurance regulators throughout the United States and its territories since our founding in 1987. INS primarily provides Accident & Health rate filing reviews, Health Actuarial consulting, Life/Health and Property/Casualty actuarial examinations and support for financial examinations, rate and captive filing reviews, and rehabilitation/liquidation support services. INS Regulatory Insurance Services, Inc. primarily performs risk focused surveillance financial examinations, market conduct examinations, and market analysis services. INS Services, Inc., our information technology company, provides CISA and AES credentialed IT specialists, as well as EDP audit specialists (ACL) for financial examinations. INSRIS-PR, LLC, is our Puerto Rico domestic through which all of our examination support services are provided to the Commonwealth of Puerto Rico. INS was created specifically to assist insurance regulators in fulfilling their responsibilities in the most efficient and cost-effective manner possible without any conflicts of interest regarding any assignment undertaken or services provided.

INS has long and varied roots in state insurance regulation, and has been a partner with over forty state insurance departments. We are one of the largest providers of regulator-only actuarial support services, and the first of its kind. INS is well-known, well-established, and well-respected within the insurance regulation community.

Purpose and Scope

INS is pleased to provide this response to the West Virginia Purchasing Division Request for Quotation (RFQ), on behalf of the Offices of the Insurance Commissioner (OIC) for actuarial rate reviews of life and health related product filings and consulting services. We understand that the life and health filings include, but are not limited to, accident and sickness, long term care, disability, annuity, health, major medical, credit and Medicare Supplement products for individual and group plans. INS has performed thousands of rate filing reviews on life, health and annuity products for numerous regulatory agencies. INS is also well qualified to provide other management consulting services for the OIC, which may include appearances by INS' personnel before legislative, executive or other bodies to respond to questions or to present reports. INS has participated in a number of insurance department rate hearings, and has presented reports and analysis at these hearings. INS is adept at preparing and presenting reports on any actuarial issue, and is well qualified to appear before judicial, legislative, executive and other bodies to respond to questions of an actuarial nature. INS presents all actuarial reports, findings, and conclusions first to the Insurance Commissioner or his designee in order that these may be discussed, with all recommended changes agreed upon, before final acceptance. INS will also partner with the OIC to assist with any management consulting services, special reviews, and other analysis of life and health related products, at the request of the OIC.

Experience and Ability to Meet RFQ Requirements

INS has performed thousands of rate filing reviews for numerous regulatory agencies. INS' current regulatory partners for Rate Filing Reviews are Delaware, Tennessee, Michigan, Iowa, Ohio, Maine, South Dakota, Wisconsin, California, and Minnesota. We have also partnered with Pennsylvania, Nebraska, North Dakota, Nevada and Hawaii to help with their regulatory needs. INS reviews and analyzes rate filings for all product lines, as our staff is technically knowledgeable and proficient for all types of products. The Reviews include filings for-profit and not-for-profit issuers for Individual, Association, Small Group and Large Group products, such as Life, Annuity, Major Medical, Long Term Care, Short Term Care, Medicare Supplement, Long Term

Credit Life, Accidental Death & Dismemberment, and Accident only. For Delaware, INS does the rate reviews for all their Life, Health and Annuity products, and has performed all of their actuarial services. INS has been doing work for Delaware Department since 1987. INS also has long term relationships with a number of other states.

INS routinely and consistently provides training for our regulatory partners, and has conducted seminars for Life, Accident and Health, and Annuity products. INS has trained Regulators in areas such as the Patient Protection and Affordable Care Act (ACA), Long Term Care insurance, and Credit insurance. INS' actuaries are extremely familiar with the ACA, having assisted a number of insurance departments in the implementation of effective rate review programs for health care reform, as well as reviewing and analyzing ACA filings, and writing papers and reports to help our regulatory partners better understand the details and intricacies of the ACA regulations.

INS has the necessary personnel and expertise to ensure an enduring and successful relationship with the OIC. A team of five INS actuaries will be dedicated to the filings for the Department. Additional actuaries will be available should assistance become necessary. INS will request permission from the Department before assigning additional actuaries to any project. All of our actuaries have extensive life and health insurance regulatory experience and meet the following minimum qualifications as described in the RFO:

- Fellow of the Society of Actuaries (FSA) and/or a Member of the American Academy of Actuaries (MAAA).
- ❖ At least five years of experience with life and health products.
- ❖ At least five years of experience with long term care products.
- Knowledgeable of Actuarial Standards Practice No. 8, "Regulatory Filings for Health Plan Entities, December 2005", updated for Deviation Language effective May 1, 2011, as reflected in Exhibit B of the RFO.
- Experienced in providing rate review services to state insurance regulators.
- No conflicts of interest with regard to any carrier that is actively writing individual or group life and health products in the West Virginia market.

In addition to meeting each of the above qualifications, INS' actuarial team is extremely knowledgeable concerning the January 13, 2013 Discussion Draft, Revision of Actuarial Standard of Practice, Number 8, "Regulatory Filings for Health Plan Entities, to Include Specific Issues Related to the Affordable Care Act." In addition, our team meets the American Academy of Actuaries Qualification Standards for public service actuaries issuing Statements of Actuarial Opinion in the health area of actuarial practice.

All of INS' actuaries have in-depth product and ACA knowledge, including:

- ACA Compliant Major Medical Plan Design
- * Risk Adjustment, Risk Corridors, and Reinsurance Programs
- Current Federal and West Virginia Regulatory Environment
- Statutory and GAAP financial accounting, including STAT Annual Statement Blanks

More detail on meeting the experience requirements for each team member is included in the individual actuary's biography summary included in the Actuarial Staff section.

With regard to rate review experience, INS actuaries have the technical actuarial knowledge and business acumen to understand each issuer's request, analyze the supporting filing materials, ensure all Federal and West Virginia requirements are met, and **properly communicate the initial review and related report to the OIC within 30 days of receiving the filing.** The report will include the results of INS' in-depth review

OIC within 30 days of receiving the filing. The report will include the results of INS' in-depth review and analysis. This should ensure a smooth process for any follow-up questions and correspondence between the issuer and the OIC.

Our actuarial staff is proficient in reviewing rate filings for all of the various life, health and annuity products, including accident and sickness, long term care, disability, annuity, health, major medical, credit and Medicare Supplement products for individual and group plans. For each rate filing review INS completes, we diligently evaluate the actuarial assumptions and justifications supporting the rate filing for accuracy and reasonableness. Our review includes analysis of trend, credibility, lapse rates, development factors, durational factors, geographical factors, loss development, loss ratios, rating bands, and all other relevant components of the rate filing. For example, each ACA filing, whether a new filing or a rate revision, shall be reviewed and analyzed to ensure that it meets ACA regulations and the OIC requirements. These requirements include the Part I Unified Rate Review Template, the Part III Actuarial Memorandum, the Part II Consumer Justification Narrative (required for a rate revision), Actuarial Certifications, Rate Schedules/Manuals, Tables, Binders and Templates. The Actuarial Memorandum, including the projection assumptions and experience will be reviewed to ensure that they contain the complete justification for the submitted rates. INS will review and analyze the pricing methodologies and assumptions, including the above-stated, as well as morbidity, mortality, expenses, risk margin/profit/surplus, ACA fees, (including fees for Reinsurance, Risk Corridors, and Risk Adjustment), Actuarial Value, Medical Loss Ratios, etc. A detailed report of our findings will be provided, and we will be available for written and oral expert testimony. All of this work will be completed on a professional, courteous basis with no conflicts of interest.

As mentioned above, one of INS' distinct advantages is that we only work for regulatory agencies (state insurance departments, Federal Government, etc.), and not for issuers. INS never has a conflict of interest regarding any actuarial work performed. This is an important difference between INS and other companies who contract with insurance departments but also work for issuers. INS is never disqualified from any work because our only clients are regulatory agencies. This point is critical, as it leads to a more trusting relationship between our regulator partners and INS. For example, our regulator partners are very comfortable asking INS for our opinion on the nuances of specific regulations, including ACA, as well as which path other states are taking in interpreting these regulations. This exclusivity to regulators also allows INS' team to constantly keep its pulse on the regulatory environment without distraction from any private sector engagements. We are in constant contact with our regulatory partners, and are available whenever any state insurance department needs immediate help - whether a filing needs to be reviewed now or whether there is a ACA issue or question which requires a quick response. It is indeed an important difference that sets INS apart.

INS will also assist the OIC with any other management consulting services, special reviews, and other analysis of life and health related products, as requested. INS also has participated in a number of insurance department rate hearings, and has presented reports and analysis at these hearings. INS is adept at preparing and presenting reports on all actuarial issues, and is well qualified to appear before judicial, legislative, executive and other bodies to respond to questions of an actuarial nature. INS will present all actuarial reports, findings, and conclusions first to the Insurance Commissioner or his designee in order that these may be discussed, with all recommended changes agreed upon before final acceptance.

INS has long term relationships with a number of states. Following is a summary of work our actuaries are performing on behalf of some of our regulatory clients:

Delaware Department of Insurance

INS has been a regulator partner with the Delaware Department of Insurance (DDOI) since 1987. INS provides all of the DDOI's actuarial services, including accident and health rate filing reviews, review of the actuarial aspects of life and annuity filings, financial examinations of life, health and property/casualty companies, review of reinsurance treaties, actuarial consulting services for captives, and special projects. INS has performed thousands of health rate filing reviews on behalf of the DDOI, including all Accident & Health rate revisions and initial rate filings. In 2012, INS performed close to 300 Accident & Health rate filing reviews for the DDOI, and performed a similar number in 2013. The products reviewed include Individual Medical, Small Group Medical, Large Group Medical, Dental, Specified Disease, Stop Loss, Credit Life, Credit Disability, Long Term Care, and Medicare Supplement. INS has participated in a number of DDOI rate hearings, and presented INS' Rate Filing Review Report at the hearings.

We are the DDOI's advisors regarding all actuarial matters relating to ACA, and have been reviewing Qualified Health Plans (QHP) and ACA rate filings effective January 1, 2014. INS reviewed all of the Delaware On and Off Exchange medical and dental filings, amounting to more than fifty filings. INS has also provided analysis of current and proposed ACA health insurance legislation, an example of which is House Bill 85 relating to Small Employer Group Health Insurance. Additionally, INS has completed the following special projects for the DDOI:

- Analysis and recommendations on the appropriate ACA Tobacco Rating factor for Delaware business.
- Comparison and analysis of 2014 ACA premiums with pre-ACA premium levels.
- Target examinations of Health Insurance Companies to make sure their rate manuals are in compliance with DDOI Regulations.
- Review and critique of unique health insurance benefits and provisions in ACA rate filings.
- Written summary language of INS rate reviews for Health Insurance Oversight System (HIOS).
- * Research on an as needed basis, and consultation on a daily basis for all ACA questions.

Tennessee Department of Commerce and Insurance

INS has been a regulator partner with the Tennessee Department of Commerce and Insurance (TDCI) since 2012, providing Accident and Health rate filing support for new products and rate revisions. INS provides Accident & Health rate filing reviews for Individual, Small Group and Large Group Medical, Long Term Care, Medicare Supplement, Disability Income, and Other Medical (Short Term, cancer, dental, etc.) products. INS has completed over 500 rate filing reviews for the TDCI, which include over 330 Accident and Health rate filing reviews for the TDCI. These numbers demonstrate our ability to handle large numbers of filings.

For ACA support to TDCI, INS reviewed over 30 Medical and Dental filings for the TDCI. We also represented the Tennessee Department as part of the Tennessee Health Insurance Exchange Technical Advisory Group relating to the 3Rs (Reinsurance, Risk Corridor and Risk Adjustment). We will continue to review rate filings for the TDCI through December 31, 2016.

Michigan Office of Insurance and Financial Services

INS has partnered with the Michigan Office of Insurance and Financial Services (DIFS) since 2010, providing Accident and Health rate filing support for new products and rate revisions. Accident and Health rates filing

reviews consist of Long Term Care, Medicare Supplement, Credit Insurance, Stop Loss, Individual Medical, Small Group Medical and Large Group medical products. We have reviewed hundreds of filings for the DIFS, including over 60 accident and health rate filing reviews in 2012 and also in 2013. INS has provided training seminars to DIFS regulators with regard to Long Term Care, Credit insurance, and Accident and Health rate filings, including an all-day seminar on Health Care Reform.

For ACA support to DIFS, besides providing the ACA seminar for DIFS, INS has completed over 30 medical ACA filings. We have also been reviewing Qualified Health Plans (QHP) for DIFS as well as completing requested reviews to ensure compliance with ACA and DIFS statutes.

Iowa Insurance Division

INS has been a regulator partner with the Iowa Insurance Division (IID) since November, 2007, providing Accident and Health rate filing support for new products and rate revisions. Accident and Health rates filing reviews consist of Long Term Care, Medicare Supplement, Credit Insurance, Individual Medical, Small Group Medical, and Large Group Medical products. INS has completed over 300 rate filing reviews for the IID, including over 60 Accident and Health rate filing reviews in 2012 and also in 2013 for the IID. We have also performed the actuarial examination of ING Annuity and Life Insurance Company within the past three years on behalf of the IID.

For ACA support to IID, we are the advisers to the IID regarding actuarial matters relating to ACA. INS has been reviewing QHP's and ACA rate revisions filings effective January 1, 2014 and later, including the review of over 30 medical and dental ACA filings. INS has been responding to the IID on their ACA questions, providing written and verbal support on the subjects of Actuarial Value, the Actuarial Value Calculator, Area/Network Rating, Composite Rating, and Stand-alone Dental plans.

Ohio Department of Insurance

INS has been assisting the Ohio Department of Insurance (ODI) since 2013, after being picked by the ODI to partner with them in the review of their ACA QHP's and rate filings. Since then, we have participated in the review of 50 Medical ACA filings.

In the past year, INS has supported the ODI in their many questions on ACA. To help the ODI better understand the details and intricacies of ACA, INS authored the following three reports, covering various current ACA issues and regulations:

- * "A Review of the Actuarial Provisions of the ACA Final Program Integrity Review"
- "A Review of ACA Large Group Requirements for 2014 Filings"
- * "A Review of the 2015 Proposed Rule for Benefit and Payment Parameters for ACA."

In addition, the ODI requested INS's recommendations and support in dealing with the Center for Consumer Information and Insurance Oversight's (CCIIO) transitional policy from their November 14, 21013 Letter, which allowed 2013 policies to maintain their current designs into 2014. INS responded very quickly to the ODI's request with sound strategic recommendations, which helped the ODI implement the ODI Bulletin 2013-01, Procedure for 2013 "Grandmother Plans" – Rate Review. INS continues to support the ODI with these reviews of issuers' rate revisions to their Major Medical plans, making sure the ODI Bulletin's requirements are met. All this work has been completed in very short timeframes. The bottom line is that the ODI relied on the INS actuaries' expertise to expedite these filings in a timely manner, which ensures continued insurance coverage for Ohio insureds.

Maine Bureau of Insurance

INS has been a regulator partner with the Maine Bureau of Insurance (MBI) since 2011, providing Long Term Care rate filing support for new products and rate revisions. The reviews encompass Long Term Care filings on both a pre-rate stabilization and post-rate stabilization basis. INS has performed over 80 Long Term Care rate filings for the MBI.

South Dakota Division of Insurance

INS has been assisting the South Dakota Division of Insurance (SDDI) since 2011, providing Long Term Care and Medicare Supplement rate filing support for new products and rate revisions. The reviews encompass Long Term Care filings on both a pre-rate stabilization and post-rate stabilization basis, and Medicare Supplement filings. INS has performed over 70 rate filings for the SDDI.

Wisconsin Office of the Commissioner of Insurance

INS has been a partner with the Wisconsin Office of the Commissioner of Insurance (WOCI) since 2007, providing Long Term Care and Medicare Supplement rate filing support for new products and rate revisions. The reviews encompass Long Term Care filings on both a pre-rate stabilization and post-rate stabilization basis, and Medicare Supplement filings. INS has performed over 250 rate filing reviews for the WOCI.

California Department of Insurance

INS has been a regulator partner with the California Department of Insurance (CDI) since 2010, providing Long Term Care rate filing support for new products and rate revisions. The reviews encompass Long Term Care filings on both a pre-rate stabilization and post-rate stabilization basis.

An example of the INS typical review process has been implemented in California, and is outlined here. The California Department of Insurance requires the Reviewing Actuary to review all aspects of the filing in great detail, as the Reviewing Actuary must also do the same required certification that the Pricing Actuary must do. The review includes analysis of the assumptions in the actuarial memorandum, certification, and supporting exhibits. The INS Actuarial Projection Model is used in the determination of the lifetime Loss Ratio. This detailed review is necessary in order to determine if the entire filing is in compliance with the applicable State laws and regulations, and also that the rates are reasonable in relation to the benefits provided. The review usually includes correspondence with the issuer to justify the filing, requesting such items as additional information or clarification, more data or experience, and/or the reasons for certain pricing assumptions. This correspondence usually will help resolve the issues, and allow approval of the filing. However, there are instances when the issues are not resolved. In these cases, modification of the filing, possibly the rates, is recommended. The end result of the process is timely communication with the State, detailing INS's work and filings, and the recommendation of approval, disapproval or modification of the filing.

Minnesota Department of Commerce

INS has been a regulator partner with the Minnesota Department of Insurance (MDC) since 2006, providing reviews of Life, Annuity and Medical filings.

For ACA support, INS assisted the MDC by reviewing the Actuarial Values which resulted from the Actuarial Value Calculator for various ACA filings. Note that Issuers must use the Actuarial Value Calculator to determine the Actuarial Metal Value for non-grandfathered health insurance coverage in the individual and

small group markets. INS determined the accuracy of the inputs to the Actuarial Value Calculator, as well as the resulting Actuarial Values, for the situation with benefits designs which the Actuarial Value Calculator can handle. However, for plans with benefit designs which cannot be handled by the Actuarial Value Calculator, exceptions are made which must be justified as actuarially appropriate. There are 2 Options to accommodate these exceptions: 1. The actuary adjusts the benefit design, for calculation purposes only, in order that it will "fit" the parameters of the Actuarial Value Calculator. 2. The actuary first uses the Actuarial Value Calculator for plan provisions which correspond to the Actuarial Value Calculator, and then calculates appropriate adjustments to the calculated Actuarial Value. This option can also handle innovative plans and/or innovative benefit features. Both options require that a member of the American Academy of Actuaries certify to the appropriateness of the methodology. INS actuaries are qualified to certify to the appropriateness of the methodology, since all INS actuaries are members of the AAA, and all meet the American Academy of Actuaries Qualification Standards for public service actuaries issuing Statements of Actuarial Opinion in the health area of actuarial practice. This is another example of INS' in-depth knowledge of ACA regulations, which shows itself in INS' complete, accurate and timely work product for our Regulatory Partners.

Pennsylvania Insurance Department

INS has worked with the Pennsylvania Insurance Department (PID) since 2010.

INS has performed work under the ACA Federal Grants and reviewed individual and small group medical rate filings for the PID. Other ACA projects which were completed by INS are shown below:

- Review of PID's rate review process for compliance with the Federal Rate Review Regulation (i.e., Effective Rate Review Process). This resulted in an INS-authored Report, which analyzed the PID's current rate review processes. The Report also included suggested enhancements in the review of filings based upon Health and Human Services' (HHS) Unreasonable and Excessive premium increase criteria.
- Analysis of the Pennsylvania Competitive Environment, which resulted in a report, "Pennsylvania Rate Level index and Consumer Comparison."
- Review of individual and small group medical filings above the 10% Subject to Review Threshold for the PID.

Nebraska Department of Insurance

INS has worked with the Nebraska Department of Insurance (NDI) for three years.

INS has performed work for the NDI under the ACA Federal Grants, which consisted of ACA rate filing reviews, development of an Effective Rate Review Process and a Rate Review Process Manual. We are now acting in an advisory role for medical rate filing reviews. More details on these projects are shown below.

- Issued a report that suggested improvements to the NDI rate review process to ensure a more robust rate review process is in place.
- Developed a comprehensive rate review procedure manual incorporating the recommended requirements for use by the NDI staff.
- Performed actuarially justified health rate reviews and disposition determination.
- ❖ Authored a report titled "Patient Protection and Affordable Care Act Analysis of Standards Related to Reinsurance, Risk Corridors and Risk Adjustment" for the NDI.

North Dakota Insurance Department

INS has worked with the North Dakota Insurance Department (NDID) for three years. INS provided Accident and Health rate filing support for new products and rate revisions. The products which we supported are Individual, Small Group and Large Group Medical, Long Term Care, Medicare Supplement, and Specified Disease (Cancer, etc.). We are also under contract to review other types of health filings and life and annuity filings. INS performed over 70 accident and health rate filing reviews for the NDID.

For ACA support to NDID, INS prepared a report for the NDID regarding Essential Health Benefits, particularly the choice of the benchmark plan, titled "Analysis of Essential Health Benefits under the Patient Protection and Affordable Care Act." Subsequent testimony was provided by INS before a North Dakota Legislative Committee regarding our findings in this report. Recently, INS has supported the recently hired NDID actuary to help the actuary better understand the many facets of the ACA regulations.

Nevada Division of Insurance

INS has worked with the Nevada Division of Insurance (NDI) for three years. INS provided Accident and Health rate filing support for new products and rate revisions. The products which we supported are Individual, Small Group and Large Group Medical filings. INS performed over 85 accident and health rate filing reviews for the NDI.

For ACA support, INS participated in the Nevada Health Benefit Rate and Form Filing Seminar/Webinar – "Preparing for January 1, 2014". This presentation was aimed at the ACA changes effective January 1, 2014. INS also participated in the review of Qualified Health Plans for the NDI and their state-based exchange.

Hawaii Department of Commerce and Consumer Affairs

INS has worked with the Hawaii Department of Commerce and Consumer Affairs (HDCCA) for two years. INS provided Accident and Health rate filing support for new products and rate revisions. The products which we supported were Individual, Small Group and Large Group Medical filings. INS performed over 60 accident and health rate filing reviews for the NDI.

For ACA support, we reviewed a number of ACA filings for the HDCCA. In addition, we helped educate the HDDCA on the details and intricacies of the ACA regulations.

Additional States

INS is also under contract to perform accident and health rate filing reviews for the Vermont Department of Financial Regulation, Massachusetts Division of Insurance, Arkansas Insurance Department, and the Government of Guam Department of Revenue and Taxation.

Recommendations from Our Regulatory Partners

The Delaware Insurance Department, the Iowa Insurance Division, the Michigan Department of Insurance and Financial Services, and the Tennessee Department of Commerce and Insurance, among others, currently retain INS to review ACA filings. In a recent Request for Proposal (RFP) which INS completed for another State, one of the requirements of the RFP was to provide Letters of Reference from Departments for which INS has done work. The result was that INS received very positive Letters of Reference from the above four

Departments which were requested to respond with a Letter of Reference. Below is a sampling of the comments included in the Letters of Reference for INS:

- One Regulator wrote "INS ...have always exhibited the highest level of professionalism and provide excellent analysis and reports. INS is an outstanding regulatory consulting firm."
- ❖ Another Regulator wrote, "INS ...have conducted themselves with a high degree of professionalism throughout our relationship with INS and demonstrated outstanding knowledge of all aspects of accident and health rate filings including the requirements of the ACA. We are extremely satisfied with INS's work."
- Another Regulator wrote, "INS's actuaries have performed high quality work in a timely and efficient manner while meeting the strict time requirements of the Health Plans Division. We look forward to continue to work with them in the future."
- Finally, another Regulator wrote, "INS ...have performed reviews in a professional manner. They have demonstrated a thorough knowledge of the ACA requirements. We are extremely satisfied with INS' work."

Professional Organization Experience and Support

INS has a rich history of involvement with a number of professional and regulatory organizations, including the American Academy of Actuaries (AAA), the Society of Actuaries (SOA), and the National Association of Insurance Commissioners (NAIC). Not only has INS been a consultant and partner to a number of insurance departments, but INS has helped and supported the AAA, the SOA and the NAIC for many years. INS has provided technical support for numerous NAIC initiatives, including Rating, Reserving, Health and Life Rate Regulation, and Technical Model Laws. Below are additional examples of technical guidance and support that INS has provided to the AAA, SOA and NAIC and other organizations:

- All INS actuaries are members of the AAA, and all meet the American Academy of Actuaries Qualification Standards for public service actuaries issuing Statements of Actuarial Opinion in the health area of actuarial practice. INS actuaries also provide technical guidance to the AAA and NAIC on many key issues, including ACA and other Health/Insurance issues.
- NS was an active participant in the 2013 two day seminar for the NAIC/The Center for Insurance Policy and Research, "Health Care Reform Symposium."
- INS has sponsored the Insurance Regulatory Symposium for the last three years, with Health Care Reform one of the key topics of the 2013 Symposium. INS actuaries have actively participated in each of the Symposiums.
- INS has experience in the NAIC committee process, from a technical actuarial nature to a broad public policy perspective. This experience includes drafting model laws and regulations, letters to other NAIC committees and task forces, discussing topics and influencing outcomes, including ACA and other Health/Insurance Regulations.
- Membership on AAA Nonforfeiture Modernization Working Group.
- Membership on AAA Committee on Membership, providing technical assistance, analysis, and recommendations on certain AAA financial statements and projections, to determine an appropriate rate for AAA membership. The Committee is also responsible for ongoing relations with existing and prospective Academy members. The Committee periodically reviews Academy membership and dues policies and recommends changes to the Board of Directors and Executive Committee. In fulfilling its charges, the Committee's role is to ensure that member affiliations and new-member recruitment activities are included as a vital part of the Academy communications plan.
- Membership on NAIC Catastrophe Risk (E) Subgroup Provided assistance in this subgroup's work to find a way to identify loss associated with known catastrophes so that insurers can exclude these

- losses from the calculation of Risk Based Capital once a separate charge for catastrophe risk is implemented.
- Wrote Comment Letter on AG-38, providing recommended solutions to the Principles Based Reserves (PBR) and ORSA issues.
- Wrote Comment Letter on AG-43, listing ambiguities and problems. Worked with Life Actuarial Task Force (LATF) and AG-43 AAA Working Group on these issues.
- Wrote Comment Letter jointly to NAIC and AAA, with recommended changes in SSAP 51 (Statements of Statutory Accounting Principles) with regard to advance premiums, deferred premiums and valuation interest rate.
- Wrote article for Small Business Section of Society of Actuaries (SOA), "Expectations of Actuaries for Small Companies."
- Wrote article for Society of Financial Examiners (SOFE) on Unclaimed Death Benefits.
- Membership on Society of Actuaries Education and Examination Committee, developing Examination questions, and grading Examinations.
- Member of the AAA Work Group which developed/recommended the following:
 - AAA Credibility Practice Note (2009)
 - o Waiver of Premium Mortality Model Regulation (2007)
- Wrote Recommendations to Actuarial Standards Board of AAA on selecting and testing X-factors (2009).
- Besides the strictly actuarial support provided by INS to the AAA, SOA and NAIC and other professional organizations as outlined above, the entire INS organization actively supports the work of the NAIC, as INS only works as a regulatory representative. Personnel representing The INS Companies are actively involved in a number of capacities and activities related to participation on various NAIC committees, subcommittees, or working groups. Our participation includes following all meetings and providing responses as an interested party to matters issued for exposure. In addition we send representatives to the NAIC triennial meetings and attend all committee, subcommittee and working group meetings. The following NAIC groups have assigned INS personnel that are responsible for attending all meetings, either in person or via teleconference, submitting summaries of the meetings to other INS personnel, and preparing responses to exposure items on behalf of INS as an interested party:
 - Market Conduct/Market Analysis all related groups
 - Financial Examiners Handbook (E) Technical Group
 - o Financial Condition (E) Committee
 - Contract Examination Oversight (E) Working Group
 - o Corporate Governance (E) Working Group
 - o Solvency Modernization Initiative RBC (E) Subgroup
 - o Capital Adequacy
 - o Statutory Accounting Principles (E) Working Group
 - o Affordable Care Act Model Review (B) Working Group
 - o Regulatory Framework (B) Task Force
 - o International Solvency
 - o International Insurance Relations (G) Committee
 - Receivership and Insolvency (E) Task Force
 - o NAIC/AICPA (E) Working Group
 - Risk Focused Surveillance (E) Working Group
 - o IT Examination (E) Working Group
 - Recent responses that our firm has provided as an interested party to NAIC Committee,
 Subcommittee or Working Group exposure items include the following:

- A response to the Contract Examination Oversight (E) Working Group related to the Financial Exam Contractor Listing.
- A response to the Financial Examiners Handbook (E) Technical Group related to changes to
 the Financial Condition Examiners Handbook (FCEH) to include the concept of critical risk
 categories, elimination of tolerable error as a risk identification trigger, and changes to the use
 of CPA workpapers in Phase 1 to reduce the consideration of certain financial reporting risks
 in an examination.
- o In addition to our regular participation in NAIC activities as noted above, one of our firm's professionals is an active NAIC Accreditation Team Member. Based on his extensive knowledge and experience in the accreditation process, he is able to provide the state/client with valuable insight and advice with respect to developing best practices that will enhance the state's ability to comply with accreditation standards.

INS' actuaries have the ability to effectively manage multiple rate filing reviews without compromising the quality of our work product. All INS actuaries are members of the AAA, and all meet the American Academy of Actuaries Qualification Standards for public service actuaries issuing Statements of Actuarial Opinion in the health area of actuarial practice. A team of five INS actuaries will be dedicated to the filings for the Department. Additional actuaries will be available should assistance become necessary. INS will request permission from the Department before assigning additional actuaries to any project. Our actuaries are ready to begin work immediately on rate filing reviews and additional projects. INS's many years of experience working exclusively with regulatory agencies has helped us identify and eliminate problem areas such as insufficient company responses, lack of responsiveness and failure to meet deadlines. We have a proven track record of maintaining professional relationships with Issuers and working well with state insurance departments.

Personnel

Actuarial Staff

The following is a listing of INS' actuarial staff available to provide actuarial and related services to the OIC in support of the actuarial rate review of life and health related product filings and consulting services.

Arthur M. Lucker, FSA, MAAA – Supervising Actuary
Joseph P. Brennan, FSA, MAAA – Life/Health Actuary
Frank G. Edwards, Jr., ASA, MAAA – Vice-President and Chief Life/Health Actuary
Mark Golab, FSA, MAAA – Life/Health Actuary
James A. Kuklinski, ASA, MAAA – Life/Health Actuary

INS' approach to any assignment is to provide experienced actuarial staff that meets the requirements of the assignment. Arthur Lucker, FSA, MAAA is the supervising actuary for all rate filing reviews performed by INS actuaries. These reviews include both rate increase filings and initial rate filings. Art and all of our actuaries have many years of relevant Health experience. All of our actuaries have worked on numerous rate filings, so when rate filings are assigned by the Art, they have the experience and technical knowledge to do an excellent job in all facets of the review. Art will assign individual filings to various staff actuaries, depending on staff availability and individuals' workload, with Art also performing rate filing reviews when needed. Staff actuaries initiate the work process and submit their findings to the supervising actuary, who will communicate all findings to West Virginia. All findings and conclusions are approved by the supervising actuary. All of our actuaries have used SERFF extensively and have performed numerous health rate filing reviews for all the states in which INS performs rate filing reviews.

Most of the actuarial rate filing reviews will be performed by Arthur M. Lucker, FSA, MAAA, Joseph Brennan, FSA, MAAA, Mark B. Golab, FSA, MAAA and James (Jay) Kuklinski, ASA, MAAA. Frank G. Edwards, Jr., ASA, MAAA, Vice President and Chief Life/Health Actuary will work closely with the supervising actuary to ensure timely and satisfactory completion. A brief biography of the available staff follows.

Arthur M. Lucker, FSA, MAAA

Arthur M. Lucker, FSA, MAAA began his actuarial career in 1973 and has been assisting insurance regulators exclusively since 1997. Art leads INS' health rate filing division and serves as main contact person concerning health rate filing reviews for all of our clients. Art performs rate filing reviews for Delaware, Guam, Hawaii, Iowa, Maine, Michigan, Nebraska, Nevada, North Dakota, Ohio, Pennsylvania, South Dakota, Tennessee, and Wisconsin. Art has assisted Guam and other regulatory clients with Centers for Medicare and Medicaid Services (CMS) conference calls, regarding qualifications for an effective rate review program. He also performs other services, including annuity and health statutory reserve analyses, health rate filing reviews, policy form reviews, reinsurance treaty reviews, Certificates of Valuation and actuarial examinations. Art has expansive knowledge of the ACA, and made suggestions to several regulatory agencies regarding the implementation of the ACA. Art has reviewed rate filings that were updated for provisions of the ACA. Art led the ACA work performed for Nevada and had ultimate supervisory responsibility for the work performed for Nebraska and Pennsylvania under the ACA Federal Grant. This work consisted of medical rate filing reviews, development of effective rate review processes, and rate review process manuals. In addition, Art has provided training seminars to regulators with regard to Long Term Care, Credit insurance, and Accident and Health rate filings, including an all-day seminar on health care reform for the Michigan Office of Financial and Insurance Regulation.

Art has met the American Academy of Actuaries Qualification Standards for public service actuaries issuing Statements of Actuarial Opinion in the health area of actuarial practice, and will continue to meet the Qualification Standards for the duration of this contract term. He has met and continues to meet the American Academy of Actuaries' and the Society of Actuaries' Standards for Continuing Professional Development. Art has over twenty-five years of experience with life and health products in his various roles and responsibilities with INS, CIGNA Group Insurance, Provident Mutual Life Insurance Company, Presbyterian Ministers' Fund, CIGNA, and Philadelphia Life Insurance Company. In addition, he has over 15 years of experience with Long Term Care products in his various roles and responsibilities with INS.

Joseph P. Brennan, FSA, MAAA

Joseph Brennan, FSA, MAAA has over thirty years of actuarial experience, including over twenty five years of health insurance rate development and pricing experience, with over 15 years of Long Term Care pricing experience. He served as Vice President for Penn Treaty Network America Insurance Company, Colonial Penn Life Insurance Company, and American Integrity Corporation. Most recently, Joe served as the Head of Employee Benefits and Actuarial Product Management for ING U.S. Joe is keenly aware of all the ACA Regulations. He has responded to numerous ACA questions from Insurance Departments, and also has authored a number of ACA reports for State Insurance Departments. These reports include three reports for Ohio, "A Review of the Actuarial Provisions of the PPACA Final Program Integrity Review", "A Review of PPACA Large Group Requirements for 2014 Filings", and "A Review of the 2015 Proposed Rule for Benefit and Payment Parameters for PPACA." Joe also performs rate filing reviews for Delaware, Michigan, Ohio, South Dakota, Iowa, Hawaii, and Tennessee. In his Pricing roles in the Industry, Joe has been involved in developing and writing countless Actuarial Rate Memoranda for all types of Health products. He has worked

hand-in-hand with State Insurance Departments in the rate filing approval process, to ensure an equitable resolution for all parties. Joe has been an active member of the Society of Actuaries' Education and Examination Committee for over twenty (20) years. He further supports the actuarial profession by writing and grading examination questions for the Fellowship-Level examinations of the Society of Actuaries. Joe has also been an active member of the American Academy of Actuaries' Membership Committee for the past six (6) years.

Joe has met the American Academy of Actuaries Qualification Standards for public service actuaries issuing Statements of Actuarial Opinion in the health area of actuarial practice, and will continue to meet the Qualification Standards for the duration of this contract term. He has met and continues to meet the American Academy of Actuaries' and the Society of Actuaries' Standards for Continuing Professional Development. Joe has over twenty-five years of experience with life and health products in his various roles and responsibilities with INS Consultants, Inc., ING U.S., American General Life, Penn Treaty Network America Insurance Company, Colonial Penn Life Insurance Company, New York Life Insurance Company, and American Integrity Corporation. In addition, he has over 15 years of experience with Long Term Care products in his various roles and responsibilities with INS, American General Life, Penn Treaty Network America Insurance Company, Colonial Penn Life Insurance Company, New York Life Insurance Company, and American Integrity Corporation.

Frank G. Edwards, Jr., ASA, MAAA

Frank G. Edwards, Jr., ASA, MAAA, Vice President and Chief Life and Health Actuary, began his actuarial career in 1981, and has been assisting regulators since 1994. Frank manages and supervises numerous regulatory projects, and oversees all life and health actuarial projects. Frank participates in a broad range of life and health regulatory actuarial services, including reserve analysis, tax reserve analysis, policy form reviews, rate reviews for Delaware and California, reinsurance treaty reviews, Certificates of Valuation, and has performed and managed hundreds of actuarial examinations for various insurance departments. Frank's more than twenty-five years' experience in the actuarial field includes positions with a number of life insurers, such as American Life Insurance Company and Philadelphia Life Insurance Company, as well as many years in the role of actuarial consultant.

Frank has met the American Academy of Actuaries Qualification Standards for public service actuaries issuing Statements of Actuarial Opinion in the health area of actuarial practice, and will continue to meet the Qualification Standards for the duration of this contract term. He has met and continues to meet the American Academy of Actuaries' and the Society of Actuaries' Standards for Continuing Professional Development. Frank has over twenty years of experience with life and health products in his various roles and responsibilities with INS Consultants, Inc., Gerald J. Rankin & Associates, Corporate Life Insurance Company, Philadelphia Life Insurance Company, and American Life Insurance Company. In addition, he has over 5 years of experience with Long Term Care products in his various roles and responsibilities with INS and Gerald J. Rankin & Associates.

Mark Golab, FSA, MAAA

Mark Golab, FSA, MAAA has over ten years of consulting experience in health insurance pricing and product development. Mark began his actuarial career in 1970 with the Philadelphia Life Insurance Company as a Health Actuary. During his distinguished forty year career, Mark held the position of Senior VP and Chief Actuary for NRG America Life Reinsurance Company for fifteen years. He was responsible for the analysis of in force medical books of business in order to measure embedded profit for the purpose of developing a reinsurance arrangement, and the management of a book of medical reinsurance business that included first

dollar and excess plans. Mark also held the position of President of Palm Actuarial Consultants, Inc. for 10 years. He was responsible for the analysis of medical business for statutory rate increases, providing expert witness testimony in Accident and Health disputes, and providing strategic planning advice in Accident and Health matters. Currently, Mark performs a broad range of actuarial services for INS including health rate filing reviews for Arkansas, California, Delaware, Hawaii, Iowa, Maine, Michigan, Nebraska, Nevada, North Dakota, Pennsylvania, South Dakota, Tennessee, and Wisconsin, and is also involved in risk-focused actuarial examinations and special projects. Mark has participated in the review process for a number of ACA filings. He also authored a report for the Nebraska Insurance Department entitled "Patient Protection and Affordable Care Act: Analysis of Standards related to Reinsurance, Risk Corridors, and Risk Adjustment".

Mark has met the American Academy of Actuaries Qualification Standards for public service actuaries issuing Statements of Actuarial Opinion in the health area of actuarial practice, and will continue to meet the Qualification Standards for the duration of this contract term. Mark has met and continues to meet the American Academy of Actuaries' and the Society of Actuaries' Standards for Continuing Professional Development. He has over twenty-five years of experience with life and health products in his various roles and responsibilities with INS Consultants, Inc., Pricewaterhouse Coopers, Palm Actuarial Consultants, Inc., NRG America Life Reinsurance Company, Colonial Penn Life Insurance Company, and Philadelphia Life Insurance Company. In addition, he has over 10 years of experience with Long Term Care products in his various roles and responsibilities with INS and NRG America Life Reinsurance Company.

James A. Kuklinski, ASA, MAAA

James A. Kuklinski, ASA, MAAA joined INS in 2008. Jay's actuarial career spans over twenty-one years (21) with Fidelity Mutual Life Insurance Company, including nine (9) years as Assistant Vice President and Actuary. Currently, Jay performs a broad range of life and accident and health actuarial services, including rate filing reviews for Delaware, Michigan, Nevada, North Dakota, and Tennessee. Jay has reviewed many ACA filings, and has an excellent knowledge of all ACA laws, regulations, and provisions.

Jay has met the American Academy of Actuaries Qualification Standards for public service actuaries issuing Statements of Actuarial Opinion in the health area of actuarial practice, and will continue to meet the Qualification Standards for the duration of this contract term. He has also met and continues to meet the American Academy of Actuaries' and the Society of Actuaries' Standards for Continuing Professional Development. Jay has over twenty-five years of experience with life and health products in his various roles and responsibilities with INS Consultants, Inc. and Fidelity Mutual Life Insurance Company. In addition, he has over 5 years of experience with Long Term Care products in his various roles and responsibilities with INS Consultants, Inc.

INS Principals

Ultimate responsibility for all work performed lies with the INS principals.

Alan E. Shaw, ASA, MAAA

Mr. Shaw, President of InsRis and INSRIS-PR, LLC, and Vice President of INS and INS Services, is a life/health insurance actuary. He is a former Chief Actuary of the Bureau of Examinations of the Pennsylvania Insurance Department. Alan has advised in the actuarial phases of financial examinations for various regulatory agencies. He has considerable experience as an advisor to regulators in the review and analysis of the financial and economic condition of troubled companies. He also has provided advice and assistance in the actuarial phases of tax audits of major life and health insurance companies conducted by the Internal Revenue

Service and in the resolution of tax matters for the Department of Justice. Currently, Mr. Shaw has administrative responsibility for all projects undertaken by INS, InsRis and INSRIS-PR, LLC.

George J. Piccoli, CFE, CIE

Mr. Piccoli, President of INS Consultants, Inc. is a former Director of the Bureau of Examinations of the Pennsylvania Insurance Department. Mr. Piccoli was employed with the Department for more than twenty years, and was responsible for the planning, scheduling, coordination and conduct of all examinations. Mr. Piccoli represented the Pennsylvania Insurance Department at the NAIC on various committees, task forces and working groups. He also served as state chairman for the Pennsylvania Chapter of the Society of Financial Examiners. In addition, Mr. Piccoli received the Society of Financial Examiners' 2010 Founders Award.

Mr. Piccoli was instrumental in the reorganization and administration of the Examination Division of the Delaware Department of Insurance, including the recruitment and employment of financial and market conduct examiners. In his consulting responsibilities, Mr. Piccoli provides expert advice and assistance in rehabilitations, liquidations, troubled companies and financial examinations. He is currently serving as Deputy Receiver in charge of the liquidation and rehabilitation of both property/casualty and life/health insurance companies.

Administrative Support

INS has a team of administrative support staff in addition to the INS actuaries who are readily available to assist on every engagement. These individuals are skilled at using the Microsoft Office suite of software and routinely provide clerical and lower level technical support for the INS actuaries on each risk-focused examination. The INS business model supports the development of non-credentialed technicians at various levels of expertise, and includes the use of these personnel as non-billable resources for larger engagements. INS will utilize these resources as needed in providing support to the Department for this engagement at no additional cost.

Resumes for the above-listed personnel appear in Appendix A – Resumes, while Certification of Qualifications appear in Appendix B.

References

We have included the following list of references for the OIC's convenience. Additional references will be provided upon request.

Delaware Department of Insurance Linda Nemes, Assistant Director, Market Regulation Linda.Nemes@state.de.us 841 Silver Lake Boulevard Dover, DE 19904 (302) 674-7373

Since 1987, INS has performed thousands of health rate filing reviews and hundreds of actuarial examinations on behalf of the Delaware Department of Insurance (DDOI). INS provides all of the DDOI's actuarial services. These include, but are not limited to, accident and health rate filing reviews, review of the actuarial aspects of life and annuity filings, financial examinations of life, health and property/casualty companies, review of reinsurance treaties, actuarial consulting services for captives, and special projects. INS currently

reviews rate filings for all health insurance products. These include Individual Medical, Small Group Medical, Large Group Medical, Dental, Specified Disease, Stop Loss, Credit Life, Credit Disability, Long Term Care and Medicare Supplement. INS reviewed all of the Delaware On and Off Exchange medical and dental filings, amounting to more than fifty filings.

Iowa Insurance Division Klete Geren, ASA, MAAA, Actuary Klete.Geren@iid.iowa.gov 330 Maple Street Des Moines, IA 50319 (515) 281-4183

INS has performed accident and health rate filing reviews for the Iowa Insurance Division (IID) since November, 2007. We also performed the actuarial examination of ING Annuity and Life Insurance Company within the past three years on behalf of the IID. INS has completed over 300 rate filing reviews for the Iowa Insurance Division. INS currently reviews rate filings for all health insurance products. These include Individual Medical, Small Group Medical, Large Group Medical, Dental, Specified Disease, Stop Loss, Credit Life, Credit Disability, Long Term Care and Medicare Supplement. INS has reviewed more than thirty medical and dental ACA filings for the IID.

Michigan Department of Insurance and Financial Services Karen Dennis, Departmental Manager

Dennisk1@michigan.gov

Health Plans Division

Ottawa Building, 3rd Floor
611 W. Ottawa

Lansing, MI 48933

INS has performed accident and health rate filing reviews for the Health Plans Division of the Michigan Department of Insurance and Financial Services (DIFS) since January, 2010. INS has completed approximately hundreds of rate filing reviews for DIFS. In addition, INS has performed over forty actuarial examinations on behalf of DIFS, including eleven within the past three years. Filing reviews consist of Long Term Care, Medicare Supplement, Credit Insurance, Stop Loss, and Individual Medical, Small Group Medical and Large Group Medical products, including over thirty medical ACA filings. We have been reviewing QHPs and ACA rate filings effective January 1, 2014 and later.

Tennessee Department of Commerce and Insurance Brian Hoffmeister, Director, Policy Analysis Section Brian.Hoffmeister@tn.gov Davy Crockett Tower, 6th Floor 500 James Robertson Parkway Nashville, TN 37243 (615) 741-5602

INS has performed accident and health rate filing reviews for the Tennessee Department of Commerce and Insurance (TDCI) since February, 2012. INS has completed over 500 rate filing reviews for the TDCI. Filing reviews consist of Individual, Small Group and Large Group Medical, Long Term Care, Medicare Supplement, Disability Income, Other Medical (Short Term, cancer, dental, etc.) products. We also represented the TDCI as part of the Tennessee Health Insurance Exchange Technical Advisory Group relating to the 3Rs (Reinsurance,

Alan E. Shaw, ASA, MAAA

EXPERIENCE

1987 - Present

INS Regulatory Insurance Services, Inc.

INS Consultants, Inc. INS Services, Inc. INSRIS-PR, LLC

Principal

Co-founder of The INS Companies, Mr. Shaw is currently responsible for all projects undertaken by INS Regulatory Insurance Services, Inc., INS Consultants, Inc. and INRIS-PR, LLC.

1985 - 1987

Simon, Master & Sidlow Associates, Inc.

Vice President and Chief Actuary

Responsible for all phases of administration of statutory examinations and Certificates of Valuation of Delaware domestic insurance companies in connection with the Delaware Department of Insurance.

1979 - 1985

Commonwealth of Pennsylvania Insurance Department

Bureau of Examinations

Life/Health Actuary

Advised and assisted the Deputy Insurance Commissioner and the Director of the Bureau of Examinations in the review and analysis of the financial and economic condition of insurance companies and fraternal benefit societies.

Responsible for preparation and issuance of Certificates of Valuation for all Pennsylvania domestic insurance companies and fraternal benefit societies.

1975 - 1979

Life Insurance Company of North America

Actuarial Associate

Line of business actuary for group statutory disability benefits, developed new rates by industry classification and rates for maternity for use in New York State.

Responsible for group permanent life insurance valuations and reserve projections; responsible for all aspects of group permanent product development and pricing, utilizing asset shares and model offices.

Supervisor/Actuarial Student

Direct supervision of the group actuarial operations unit consisting of five employees.

Responsible for the monthly operating statement for the group division involving more than two hundred million dollars of annualized premiums.

Alan E. Shaw, ASA, MAAA

EXPERIENCE (CONTINUED)

1973 - 1975

Towers, Perrin, Forster & Crosby, Inc.

Actuarial Analyst

Performed pension plan valuations utilizing various costing methods and data preparation techniques to develop actuarial liabilities and normal costs.

EDUCATION

LaSalle College - Philadelphia, Pennsylvania Bachelors Degree in Mathematics - 1973

PROFESSIONAL CREDENTIALS

Associate of the Society of Actuaries, 1979 Completed Society of Actuaries Examinations I through VI and Part IX Member of the American Academy of Actuaries, 1987

George J. Piccoli, CFE, CIE

EXPERIENCE

1987 - Present

INS Regulatory Insurance Services, Inc.

INS Consultants, Inc. INS Services, Inc. INSRIS-PR, LLC

Principal

Co-founder of The INS Companies, Mr. Piccoli presides at all meetings of both stockholders and Board of Directors and manages the business of the corporations.

Clients primarily consist of Insurance Departments of various states. Consulting services consist of performing examinations, review of reports of examination, reinsurance, assisting in rehabilitations and liquidations, claims management and adjusting and other general regulatory concerns.

At request of the Delaware Department of Insurance, serve as Deputy Receiver of the rehabilitation and liquidation of several estates.

1985 - 1987

Simon, Master & Sidlow Associates, Inc.

Executive Vice President

Responsible for the administration of all insurance operations of Simon, Master & Sidlow Associates, Inc., concerning the Delaware Department of Insurance.

1979 - 1985

Commonwealth of Pennsylvania Insurance Department

Bureau of ExaminationsDirector, Chief Examiner

Responsible for planning, scheduling, coordinating and conducting all examinations (over 300) performed by the Pennsylvania Insurance Department. Presided over hearings for liquidations, rehabilitations and compliance of Pennsylvania Insurance Laws. Assisted the Insurance Commissioner in establishing policy for the Insurance Department. Supervised a staff of approximately fifty employees.

1964 - 1979

Commonwealth of Pennsylvania Insurance Department Bureau of Examinations

Assistant Director, Insurance Company Examiner

Assisted the Director of the Bureau of Examinations in his capacity as administrator in the entire examination process. Participated as Examiner In-Charge examining various types of insurance companies for solvency purposes.

George J. Piccoli, CFE, CIE

SPECIALIZED TRAINING

College of Insurance, Examiner Program
US Civil Service Commission - Auditing Techniques for EDP Systems
National Association of Insurance Commissioners' Reinsurance Seminar
Society of Financial Examiners' Career Development Seminar (attend annually)

PROFESSIONAL CREDENTIALS

Certified Financial Examiner Pennsylvania State Chairman, Society of Financial Examiners - 1985 Certified Insurance Examiner Special Deputy Receiver, State of Delaware

Arthur M. Lucker, FSA, MAAA

EXPERIENCE

1997 - Present

INS Consultants, Inc.

1994 - 1994

Actuary

Involved in broad range of Life and Accident/Health actuarial services, including life, annuity and health statutory loss reserve analysis, rate filing reviews, including Long Term Care products, policy form reviews, including Long Term Care products, reinsurance treaty reviews, Certificates of Valuation for Insurance Departments and actuarial examinations and training for Insurance Departments.

1994 - 1997

CIGNA Group Insurance

Manager

Regulatory Actuary responsible for the preparation of the actuarial portion of rate and form filings for all state insurance departments.

1990 - 1994

Provident Mutual Life Insurance

Assistant Actuary

Responsible for quarterly financial reporting of statutory reserves, preparation of actuarial exhibits in the Annual Statement and dealing with internal and external auditors and state regulators. Assisted the valuation actuary with cash flow testing.

1988 - 1990

Presbyterian Ministers' Fund

Assistant Actuary

Responsible for updating the current valuation system for universal life, quarterly financial reporting of statutory reserves and preparation of actuarial exhibits in the Annual Statement.

1987 - 1988

CIGNA

Assistant Actuary

Responsible for implementing a universal life valuation system, assisting in the preparation of Annual Statements and GAAP financial reporting.

Philadelphia Life Insurance Company

1973 - 1987

Assistant Actuary

Major duties included developing statutory and GAAP reserves for financial reporting, quarterly financial reporting of GAAP reserves, pricing of life and annuity products, development of a flexible premium deferred annuity administration and reserve system and manager of the annuity section of the actuarial department (which included valuation and pricing).

Arthur M. Lucker, FSA, MAAA

EDUCATION

Rutgers University Bachelor of Arts, Mathematics - 1973

PROFESSIONAL CREDENTIALS

Fellow, Society of Actuaries Member, American Academy of Actuaries

QUALIFICATIONS SPECIFIC TO THIS RFQ

Please refer to Mr. Lucker's Executive Summary located in the Actuarial Staff section of this response.

Joseph P. Brennan, FSA, MAAA

EXPERIENCE

2013 - Present

INS Consultants, Inc.

Actuary

Involved in broad range of Life and Accident/Health actuarial services, including life, annuity and health statutory loss reserve analysis, rate filing reviews for all product lines, including Long Term Care products, policy form reviews, including Long Term Care products, reinsurance treaty reviews, Certificates of Valuation for Insurance Departments and actuarial examinations and training for Insurance Departments. Authored several ACA Reports, including "A Review of the Actuarial Provisions of the PPACA Final Program Integrity Review", "A Review of PPACA Large Group Requirements for 2014 Filings", and "A Review of the 2015 Proposed Rule for Benefit and Payment Parameters for PPACA."

2012 - 2013

ING U.S.

Head of Employee Benefits Actuarial Product Management

Responsible for development and management of profitable Voluntary/Worksite, Group Life, and Medical Stop Loss products, with a strong emphasis on Accident and Health lines of business. Strategic and leadership role to drive top and bottom line growth.

2006 - 2011

American General Life - Benefit Solutions

Director and Actuary

Pricing, Financial and Product Solutions for Group and Worksite Accident and Health products. Developed pricing and product support for Critical Illness, Cancer, Long Term Care, Dental, Limited Medical, Excess Major Medical, and Accident products. Recommend appropriate rate and product changes for these products, STD and LTD. Developed strategic product initiatives to increase profit and market penetration.

2003 - 2006

Penn Treaty Network America Insurance Company

Vice President and Actuary

Pricing and Product Development for Long Term Care and Medicare Supplement products. Key member of the Marketing Strategies Team. Developed Actuarial Memoranda and responded to insurance department requests. Recommended appropriate and profitable rate increase strategies.

Colonial Penn Life Insurance Company

1996 - 2003

Vice President, Product Development and Analysis

1984 – 1991 Associate Actuary, Life and Health Actuarial Department

Directed and managed life, health and annuity products to required profitability. Created innovative products for the senior market in short time period, including Short and Long Term Care, Medicare Supplement, Critical Illness, Graded Benefit Whole Life, AD&D, and High Face Term, which increased premium to 72% above plan.

Joseph P. Brennan, FSA, MAAA

EXPERIENCE (CONTINUED)

1993 - 1996

New York Life Insurance Company

Long Term Care Actuary, Group and Long Term Care Insurance Division

Evaluated risk and established profitability targets for Long Term Care business. Developed and priced new and innovative Long Term Care products for a start-up Long Term Care operation which lead to a 50% increase in premium. Completed a new financial projection model to analyze profitability and marketing results, prepared and monitored new product filings to approval status with insurance departments, to meet aggressive marketing target dates. Approved reserving methodology and analyzed morbidity experience to maintain profitability.

1991 - 1993

American Integrity Corporation

Vice President & Chief Actuary

Responsible for the risk management for all actuarial functions of corporation and subsidiaries. Priced and reserved Long Term Care, Medicare Supplement, and other health products to target profitability levels. Analyzed morbidity and persistency experience for direct and reinsured business to discover emerging trends. Prepared financial forecasts including determination of relevant assumptions (morbidity, persistency, expenses, investment yields, etc.) for strategic planning and regulatory reporting. Determined required rate increase levels and prepared Actuarial Rate Memoranda to insure timely rate adjustments to maintain profitability.

EDUCATION

St. Joseph's University Bachelor of Science, Mathematics

PROFESSIONAL CREDENTIALS

Fellow, Society of Actuaries Member, American Academy of Actuaries

QUALIFICATIONS SPECIFIC TO THIS RFQ

Please refer to Mr. Brennan's Executive Summary located in the Actuarial Staff section of this response.

Frank G. Edwards, ASA, MAAA

EXPERIENCE

INS Consultants, Inc.

2011 - Present

Chief Life/Health Actuary

2008 - Present

Vice President

1994 - 1999

Actuary

Responsible for all life/health actuarial projects undertaken by INS. Oversees a broad range of Life/Health actuarial services, including reserve analysis, rate filing reviews, including Long Term Care products, policy form reviews, including Long Term Care products, reinsurance treaty reviews, Certificates of Valuation for insurance departments and actuarial examinations and training for insurance departments. Designed actuarial procedures for risk focused surveillance examinations.

1999 - 2001 1989 - 1994

Gerald J. Rankin & Associates

Consulting Actuary

Consulting Actuary for small to mid-size insurance companies selling mostly individual life and health products, including Long Term Care products. Broad range of work including: financial reporting and annual statement preparation for all clients; profitability analysis for life and health products; analysis of reinsurance requirements including the development or enhancements needed to administer reinsurance agreements; calculation of GAAP and Statutory reserve factors using Basic programs and development of asset liability matching models.

1985 - 1989

Corporate Life Insurance Company

Actuarial Analyst

Responsibilities included all general actuarial work, including annual statement preparation, calculation of reserves and supporting documentation and development of Universal Life and annuity illustrations along with other personal computer applications for various departments.

1984 - 1985

Philadelphia Life Insurance Company

Actuarial Analyst

Assisted marketing department with development of Universal Life illustrations and wrote programs to calculate CRVM reserves for all Universal Life products.

1981 - 1984

American Life Insurance Company

General actuarial work with emphasis on writing programs on the mainframe computer to calculate cash values and reserves for new and existing life and annuity products.

Frank G. Edwards, ASA, MAAA

EDUCATION

West Chester University BA in Mathematics

PROFESSIONAL CREDENTIALS

Associate, Society of Actuaries, 1988 Member, American Academy of Actuaries, 1989

QUALIFICATIONS SPECIFIC TO THIS RFQ

Please refer to Mr. Edwards' Executive Summary located in the Actuarial Staff section of this response.

Mark Golab, FSA, MAAA

EXPERIENCE

2008 - Present

INS Consultants, Inc.

Actuary

Involved in broad range of Life and Accident/Health actuarial services, including rate filing reviews, including Long Term Care products, loss reserve analysis, policy form reviews, including Long Term Care products, reinsurance treaty reviews, Certificates of Valuation for Insurance Departments and actuarial examinations for Insurance Departments.

2005 - 2008

PricewaterhouseCoopers

Director

1996 - 2005

Palm Actuarial Consultants, Inc.

President

Responsibilities included Financial Reporting, Cash Flow Testing, Business Appraisals, Product Design, Reinsurance Planning, and Expert Witness-Arbitration & Litigation

1981 - 1996

NRG America Life Reinsurance Company

Senior Vice President and Chief Actuary

Served as an Appointed Actuary and Manager of Actuarial Department; Responsibilities included Design and Negotiation of portfolio reinsurance agreements, including Long Term Care products, Reinsurance Pricing, including Long Term Care products, Reinsurance Accounting, including Long Term Care products, Negotiation of domestic, European and "offshore" retrocessional facilities.

1978 - 1981

Colonial Penn Life Insurance Company

Tax Actuary

1970 - 1977

Philadelphia Life Insurance Company

Health Actuary

PROFESSIONAL CREDENTIALS

Fellow, Society of Actuaries

Member, American Academy of Actuaries

QUALIFICATIONS SPECIFIC TO THIS RFQ

Please refer to Mr. Golab's Executive Summary located in the Actuarial Staff section of this response.

James Kuklinski, ASA, MAAA

EXPERIENCE

2008 - Present

INS Consultants, Inc.

Actuary

Involved in broad range of Life and Accident/Health actuarial services, rate filing reviews, including Long Term Care products, loss reserve analysis, policy form reviews, including Long Term Care products, reinsurance treaty reviews, Certificates of Valuation for Insurance Departments and actuarial examinations for Insurance Departments.

Fidelity Mutual Life Insurance Co.

1999 - 2008

Assistant Vice President and Actuary

Member of management responsible for actuarial financial reporting and reinsurance administration. Supervised and provided technical guidance to reinsurance specialists. Other duties included reinsurance negotiation and pricing, monthly reporting analysis, various actuarial calculations or other assistance to customer service and controller departments. Member of Business Practices Committee.

1984 - 1999

Actuarial Officer

Junior officer progressively responsible for dividend scale implementation, group operating results and rate analysis, reinsurance analysis and administration.

1978 - 1984

Actuarial Associate

ASA student position assigned various actuarial duties, including programming, product development, dividend scale analysis, and commission scale submissions.

1977 - 1978

Actuarial Analyst

Beginning actuarial student assigned to various actuarial duties, including expense study and systems conversions.

PROFESSIONAL CREDENTIALS

Associate, Society of Actuaries Member, American Academy of Actuaries

QUALIFICATIONS SPECIFIC TO THIS RFO

Please refer to Mr. Kuklinski's Executive Summary located in the Actuarial Staff section of this response.

Appendix B – Certification of Qualifications