



July 7, 2022

Commissioner Andrew N. Mais, Chair
Commissioner Russell Toal, Vice Chair
Health Actuarial (B) Task Force
National Association of Insurance Commissioners

Re: Proposed 2022 Group Life Waiver Tables and Adjustment Factors

On behalf of the Group Life Waiver Premium Valuation Table Work Group (Work Group) of the American Academy of Actuaries (Academy)¹ and the Society of Actuaries Research Institute (SOARI),² I would like to submit our Proposed 2022 Group Life Waiver Tables and Adjustment Factors to the National Association of Insurance Commissioners (NAIC) Health Actuarial (B) Task Force (HATF). It contains the proposed tables as well as the current tables (2005 Tables). It supplements the information provided regarding an update to Actuarial Guideline XLIV (AG 44).

This Excel file is an addendum to the “Draft of the Revised AG 44” document, and the *Graduation of Group Life Waiver of Premium Disability Experience Rates* report by Jerry Holman (dated February 2022) [submitted](#) to the NAIC HATF on June 13, 2022.

We welcome the opportunity to speak with you in more detail and answer any questions you have regarding these recommendations. If you have any questions or to discuss further, please contact Matthew Williams, the Academy’s senior health policy analyst, at williams@actuary.org.

Sincerely,

Susan Sames, MAAA, FSA
Chairperson, Group Life Waiver Premium Valuation Table Work Group
American Academy of Actuaries/Society of Actuaries Research Institute

CC: Paul Lombardo, Eric King

¹ The American Academy of Actuaries is a 19,500-member professional association whose mission is to serve the public and the U.S. actuarial profession. For more than 50 years, the Academy has assisted public policymakers on all levels by providing leadership, objective expertise, and actuarial advice on risk and financial security issues. The Academy also sets qualification, practice, and professionalism standards for actuaries in the United States.

² Serving as the research arm of the Society of Actuaries, the SOA Research Institute provides objective, data-driven research bringing together tried and true practices and future-focused approaches to address societal challenges and business needs. The Institute provides trusted knowledge, extensive experience and new technologies to actuaries, employers, regulators, research funders and the public, to help them effectively identify, predict and manage risks.