

AUG 02 2022

**INSURANCE REGULATION** Docketed by:

## OFFICE OF INSURANCE REGULATION

DAVID ALTMAIER

COMMISSIONER

IN THE MATTER OF:

CASE NO.: 291816-22-CO

UNION SECURITY INSURANCE COMPANY

## **CONSENT ORDER**

THIS CAUSE came on for consideration as a result of a rate filing submitted to the FLORIDA OFFICE OF INSURANCE REGULATION ("OFFICE") by UNION SECURITY INSURANCE COMPANY ("UNION SECURITY" or "company"). Following a complete review of the entire record, and upon consideration thereof, and being otherwise fully advised in the premises, the OFFICE hereby finds as follows:

- The OFFICE has jurisdiction over the subject matter of and the parties to this 1. proceeding.
- 2. UNION SECURITY is a foreign insurer domiciled in Kansas, authorized to transact life and health insurance business in Florida, and subject to regulation by the OFFICE pursuant to the Florida Insurance Code and Florida Administrative Code.
- 3. UNION SECURITY has submitted a filing for a rate increase on certain long-term care policy forms underwritten by the company.
- Based upon the OFFICE's review of UNION SECURITY's proposed long-term 4. care rate schedules as filed in Florida file log number FLR 21-012622, the OFFICE has determined that the company's proposed premium rates have not been adequately demonstrated to be

reasonable in relation to the benefits provided as required by Section 627.410, Florida Statutes, and Rule Chapter 69O-149, Florida Administrative Code. However, the OFFICE has determined that some rate increase is necessary in order for UNION SECURITY to have adequate rates and protect the interests of its policyholders.

- 5. In order to resolve this issue, and in the aim of bringing consumer clarity to all current UNION SECURITY long-term care policyholders, the OFFICE, subject to the limitations and restrictions stated below, approves rate increases as outlined in paragraphs 6 through 13, below.
- 6. UNION SECURITY agrees to be subject to the following terms and conditions with respect to the 6062-FL, 6063-FL (Rev. 3-98),6072-FL, 6073-FL, 6073-FL (Rev. 3-98) Inflation forms on its Comprehensive Block:
- a. The company or representatives of the company shall not implement any further rate increase on the policies in this paragraph number 6 and at issue in file log number FLR 21-012622 for a period of 10 years;
- b. The rate increase shall be implemented over a period of 3 years. The first increment shall be imposed beginning at least 45 days after the date of approval, with the following two increments imposed thereafter on or after the anniversary date of the prior year's increase, but in no event will any policyholder receive more than one rate increase within a twelve-month (consecutive) period;
- c. The amount of the rate increase will also take into account the issue age of the policyholder and the type of policy form held by each policyholder. The increases will be implemented according to the following table:

|  | First            | t Year    |                  |           | Secor            | nd Year   |                  | Third Year |                  |           |                 |  |
|--|------------------|-----------|------------------|-----------|------------------|-----------|------------------|------------|------------------|-----------|-----------------|--|
| Inflation Forms: 6062-FL, 6063-FL, 6063-FL (Rev. 3-98),6072-FL, 6073-FL, 6073-FL (Rev. 3-98) |                  |           |                  |           |                  |           |                  |            |                  |           |                 |  |
| Issue Age  | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age  | Rate<br>Increase | Issue Age | Rate<br>Increas |  |
| 18   | 26.0%            | 52        | 26.0%            | 18        | 26.0%            | 52        | 26.0%            | 18         | 26.0%            | 52        | 26.0%           |  |
| 19   | 26.0%            | 53        | 26.0%            | 19        | 26.0%            | 53        | 26.0%            | 19         | 26.0%            | 53        | 26.0%           |  |
| 20   | 26.0%            | 54        | 26.0%            | 20        | 26.0%            | 54        | 26.0%            | 20         | 26.0%            | 54        | 26.0%           |  |
| 21   | 26.0%            | 55        | 26.0%            | 21        | 26.0%            | 55        | 26.0%            | 21         | 26.0%            | 55        | 26.0%           |  |
| 22   | 26.0%            | 56        | 26.0%            | 22        | 26.0%            | 56        | 26.0%            | 22         | 26.0%            | 56        | 26.0%           |  |
| 23   | 26.0%            | 57        | 26.0%            | 23        | 26.0%            | 57        | 26.0%            | 23         | 26.0%            | 57        | 26.0%           |  |
| 24   | 26.0%            | 58        | 26.0%            | 24        | 26.0%            | 58        | 26.0%            | 24         | 26.0%            | 58        | 26.0%           |  |
| 25   | 26.0%            | 59        | 26.0%            | 25        | 26.0%            | 59        | 26.0%            | 25         | 26.0%            | 59        | 26.0%           |  |
| 26   | 26.0%            | 60        | 26.0%            | 26        | 26.0%            | 60        | 26.0%            | 26         | 26.0%            | 60        | 26.0%           |  |
| 27   | 26.0%            | 61        | 26.0%            | 27        | 26.0%            | 61        | 26.0%            | 27         | 26.0%            | 61        | 26.0%           |  |
| 28   | 26.0%            | 62        | 26.0%            | 28        | 26.0%            | 62        | 26.0%            | 28         | 26.0%            | 62        | 26.0%           |  |
| 29   | 26.0%            | 63        | 26.0%            | 29        | 26.0%            | 63        | 26.0%            | 29         | 26.0%            | 63        | 26.0%           |  |
| 30   | 26.0%            | 64        | 26.0%            | 30        | 26.0%            | 64        | 26.0%            | 30         | 26.0%            | 64        | 26.0%           |  |
| 31   | 26.0%            | 65        | 26.0%            | 31        | 26.0%            | 65        | 26.0%            | 31         | 26.0%            | 65        | 26.0%           |  |
| 32   | 26.0%            | 66        | 26.0%            | 32        | 26.0%            | 66        | 26.0%            | 32         | 26.0%            | 66        | 26.0%           |  |
| 33   | 26.0%            | 67        | 26.0%            | 33        | 26.0%            | 67        | 26.0%            | 33         | 26.0%            | 67        | 26.0%           |  |
| 34   | 26.0%            | 68        | 26.0%            | 34        | 26.0%            | 68        | 26.0%            | 34         | 26.0%            | 68        | 26.0%           |  |
| 35   | 26.0%            | 69        | 26.0%            | 35        | 26.0%            | 69        | 26.0%            | 35         | 26.0%            | 69        | 26.0%           |  |
| 36   | 26.0%            | 70        | 26.0%            | 36        | 26.0%            | 70        | 26.0%            | 36         | 26.0%            | 70        | 26.0%           |  |
| 37   | 26.0%            | 71        | 23.9%            | 37        | 26.0%            | 71        | 23.9%            | 37         | 26.0%            | 71        | 23.9%           |  |
| 38   | 26.0%            | 72        | 21.6%            | 38        | 26.0%            | 72        | 21.6%            | 38         | 26.0%            | 72        | 21.6%           |  |
| 39   | 26.0%            | 73        | 19.3%            | 39        | 26.0%            | 73        | 19.3%            | 39         | 26.0%            | 73        | 19.3%           |  |
| 40   | 26.0%            | 74        | 17.0%            | 40        | 26.0%            | 74        | 17.0%            | 40         | 26.0%            | 74        | 17.0%           |  |
| 41   | 26.0%            | 75        | 14.5%            | 41        | 26.0%            | 75        | 14.5%            | 41         | 26.0%            | 75        | 14.5%           |  |
| 42   | 26.0%            | 76        | 11.9%            | 42        | 26.0%            | 76        | 11.9%            | 42         | 26.0%            | 76        | 11.9%           |  |
| 43   | 26.0%            | 77        | 9.1%             | 43        | 26.0%            | 77        | 9.1%             | 43         | 26.0%            | 77        | 9.1%            |  |
| 44   | 26.0%            | 78        | 6.3%             | 44        | 26.0%            | 78        | 6.3%             | 44         | 26.0%            | 78        | 6.3%            |  |
| 45   | 26.0%            | 79        | 3.2%             | 45        | 26.0%            | 79        | 3.2%             | 45         | 26.0%            | 79        | 3.2%            |  |
| 46   | 26.0%            | 80        | 0.0%             | 46        | 26.0%            | 80        | 0.0%             | 46         | 26.0%            | 80        | 0.0%            |  |
| 47   | 26.0%            | 81        | 0.0%             | 47        | 26.0%            | 81        | 0.0%             | 47         | 26.0%            | 81        | 0.0%            |  |
| 48   | 26.0%            | 82        | 0.0%             | 48        | 26.0%            | 82        | 0.0%             | 48         | 26.0%            | 82        | 0.0%            |  |
| 49   | 26.0%            | 83        | 0.0%             | 49        | 26.0%            | 83        | 0.0%             | 49         | 26.0%            | 83        | 0.0%            |  |
| 50   | 26.0%            | 84        | 0.0%             | 50        | 26.0%            | 84        | 0.0%             | 50         | 26.0%            | 84        | 0.0%            |  |
| 51   | 26.0%            | 8.5       | 0.0%             | 51        | 26.0%            | 85        | 0.0%             | 51         | 26.0%            | 85        | 0.0%            |  |

- 7. UNION SECURITY further agrees to provide the following options to policyholders on the 6062-FL, 6063-FL, 6063-FL (Rev. 3-98), 6072-FL, 6073-FL, 6073-FL (Rev. 3-98) Inflation forms on its Comprehensive Block who would like to lower premium costs:
- a. Accepting a reduction in the daily benefit provided by the policy, if not already at a minimum;
- b. Accepting a reduction in the benefit period provided by the policy, if not already at a minimum;

- c. Accepting an increased elimination period under the policy, if not already at a maximum. This option would increase the policyholder's initial out of pocket cost before the policy begins to provide benefits;
- d. Accepting a reduction or removal of the inflation factor (compound or simple) provided under the policy. This option would freeze the policyholder's daily benefit amount at the currently inflated level, and alter or remove future inflation protection;
- e. Accepting a paid-up policy with maximum benefits equal to the premium paid less any claims paid. This option would exempt the policyholder from making any future premium payments. Any optional riders will terminate, and no future inflation adjustments will be made. All other policy provisions, other than the maximum benefit, would remain unchanged.
- 8. UNION SECURITY agrees to be subject to the following terms and conditions with respect to the 6062-FL, 6063-FL, 6063-FL (Rev. 3-98),6072-FL, 6073-FL, 6073-FL (Rev. 3-98) Non-Inflation forms on its Comprehensive Block:
- a. The company or representatives of the company shall not implement any further rate increase on the policies this paragraph number 8 and at issue in file log number FLR 21-012622 for a period of 10 years;
- b. The rate increase shall be implemented over a period of 3 years. The first increment shall be imposed beginning at least 45 days after the date of approval, with the following two increments imposed thereafter on or after the anniversary date of the prior year's increase, but in no event will any policyholder receive more than one rate increase within a twelve-month (consecutive) period;

c. The amount of the rate increase will also take into account the issue age of the policyholder and the type of policy form held by each policyholder. The increases will be implemented according to the following table:

|   | Firs             | t Year    |                  |           | Secon            | d Year     |                  | Third Year |                  |           |               |  |
|---|------------------|-----------|------------------|-----------|------------------|------------|------------------|------------|------------------|-----------|---------------|--|
| Non- Inflation Forms: 6062-FL, 6063-FL, |                  |           |                  | 6063-FL ( | Rev. 3-98        | ),6072-FL, | 6073-FL,         | 6073-FL (R | lev. 3-98)       |           |               |  |
| Issue Age                               | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age  | Rate<br>Increase | Issue Age  | Rate<br>Increase | Issue Age | Rate Increase |  |
| 18                                      | 23.9%            | 52        | 23.9%            | 18        | 23.9%            | 52         | 23.9%            | 18         | 23.9%            | 52        | 23.9%         |  |
| 19                                      | 23.9%            | 53        | 23.9%            | 19        | 23.9%            | 53         | 23.9%            | 19         | 23.9%            | 53        | 23.9%         |  |
| 20                                      | 23.9%            | 54        | 23.9%            | 20        | 23.9%            | 54         | 23.9%            | 20         | 23.9%            | 54        | 23.9%         |  |
| 21                                      | 23.9%            | 55        | 23.9%            | 21        | 23.9%            | 55         | 23.9%            | 21         | 23.9%            | 55        | 23.9%         |  |
| 22                                      | 23.9%            | 56        | 23.9%            | 22        | 23.9%            | 56         | 23.9%            | 22         | 23.9%            | 56        | 23.9%         |  |
| 23                                      | 23.9%            | 57        | 23.9%            | 23        | 23.9%            | 57         | 23.9%            | 23         | 23.9%            | 57        | 23.9%         |  |
| 24                                      | 23.9%            | 58        | 23.9%            | 24        | 23.9%            | 58         | 23.9%            | 24         | 23.9%            | 58        | 23.9%         |  |
| 25                                      | 23.9%            | 59        | 23.9%            | 25        | 23.9%            | 59         | 23.9%            | 25         | 23.9%            | 59        | 23.9%         |  |
| 26                                      | 23.9%            | 60        | 23.9%            | 26        | 23.9%            | 60         | 23.9%            | 26         | 23.9%            | 60        | 23.9%         |  |
| 27                                      | 23.9%            | 61        | 23.9%            | 27        | 23.9%            | 61         | 23.9%            | 27         | 23.9%            | 61        | 23.9%         |  |
| 28                                      | 23.9%            | 62        | 23.9%            | 28        | 23.9%            | 62         | 23.9%            | 28         | 23.9%            | 62        | 23.9%         |  |
| 29                                      | 23.9%            | 63        | 23.9%            | 29        | 23.9%            | 63         | 23.9%            | 29         | 23.9%            | 63        | 23.9%         |  |
| 30                                      | 23.9%            | 64        | 23.9%            | 30        | 23.9%            | 64         | 23.9%            | 30         | 23.9%            | 64        | 23.9%         |  |
| 31                                      | 23.9%            | 65        | 23.9%            | 31        | 23.9%            | 65         | 23.9%            | 31         | 23.9%            | 65        | 23.9%         |  |
| 32                                      | 23.9%            | 66        | 23.9%            | 32        | 23.9%            | 66         | 23.9%            | 32         | 23.9%            | 66        | 23.9%         |  |
| 33                                      | 23.9%            | 67        | 23.9%            | 33        | 23.9%            | 67         | 23.9%            | 33         | 23.9%            | 67        | 23.9%         |  |
| 34                                      | 23.9%            | 68        | 23.9%            | 34        | 23.9%            | 68         | 23.9%            | 34         | 23.9%            | 68        | 23.9%         |  |
| 35                                      | 23.9%            | 69        | 23.9%            | 35        | 23.9%            | 69         | 23.9%            | 35         | 23.9%            | 69        | 23.9%         |  |
| 36                                      | 23.9%            | 70        | 23.9%            | 36        | 23.9%            | 70         | 23.9%            | 36         | 23.9%            | 70        | 23.9%         |  |
| 37                                      | 23.9%            | 71        | 21.9%            | 37        | 23.9%            | 71         | 21.9%            | 37         | 23.9%            | 71        | 21.9%         |  |
| 38                                      | 23.9%            | 72        | 19.8%            | 38        | 23.9%            | 72         | 19.8%            | 38         | 23.9%            | 72        | 19.8%         |  |
| 39                                      | 23.9%            | 73        | 17.7%            | 39        | 23.9%            | 73         | 17.7%            | 39         | 23.9%            | 73        | 17.7%         |  |
| 40                                      | 23.9%            | 74        | 15.5%            | 40        | 23.9%            | 74         | 15.5%            | 40         | 23.9%            | 74        | 15.5%         |  |
| 41                                      | 23.9%            | 75        | 13.2%            | 41        | 23.9%            | 75         | 13.2%            | 41         | 23.9%            | 75        | 13.2%         |  |
| 42                                      | 23.9%            | 76        | 10.8%            | 42        | 23.9%            | 76         | 10.8%            | 42         | 23.9%            | 76        | 10.8%         |  |
| 43                                      | 23.9%            | 77        | 8.3%             | 43        | 23.9%            | 77         | 8.3%             | 43         | 23.9%            | 77        | 8.3%          |  |
| 44                                      | 23.9%            | 78        | 5.7%             | 44        | 23.9%            | 78         | 5.7%             | 44         | 23.9%            | 78        | 5.7%          |  |
| 45                                      | 23.9%            | 79        | 2.9%             | 45        | 23.9%            | 79         | 2.9%             | 45         | 23.9%            | 79        | 2.9%          |  |
| 46                                      | 23.9%            | 80        | 0.0%             | 46        | 23.9%            | 80         | 0.0%             | 46         | 23.9%            | 80        | 0.0%          |  |
| 47                                      | 23.9%            | 81        | 0.0%             | 47        | 23.9%            | 81         | 0.0%             | 47         | 23.9%            | 81        | 0.0%          |  |
| 48                                      | 23.9%            | 82        | 0.0%             | 48        | 23.9%            | 82         | 0.0%             | 48         | 23.9%            | 82        | 0.0%          |  |
| 49                                      | 23.9%            | 83        | 0.0%             | 49        | 23.9%            | 83         | 0.0%             | 49         | 23.9%            | 83        | 0.0%          |  |
| 50                                      | 23.9%            | 84        | 0.0%             | 50        | 23.9%            | 84         | 0.0%             | 50         | 23.9%            | 84        | 0.0%          |  |
| 51                                      | 23.9%            | 85        | 0.0%             | 51        | 23.9%            | 85         | 0.0%             | 51         | 23.9%            | 85        | 0.0%          |  |

- 9. UNION SECURITY further agrees to provide the following options to policyholders on the 6062-FL, 6063-FL, 6063-FL (Rev. 3-98),6072-FL, 6073-FL, 6073-FL (Rev. 3-98) Non-Inflation forms on its Comprehensive Block who would like to lower premium costs:
- a. Accepting a reduction in the daily benefit provided by the policy, if not already at a minimum;

- b. Accepting a reduction in the benefit period provided by the policy, if not already at a minimum;
- c. Accepting an increased elimination period under the policy, if not already at a maximum. This option would increase the policyholder's initial out of pocket cost before the policy begins to provide benefits;
- d. Accepting a paid-up policy with maximum benefits equal to the premium paid less any claims paid. This option would exempt the policyholder from making any future premium payments. Any optional riders will terminate, and no future inflation adjustments will be made. All other policy provisions, other than the maximum benefit, would remain unchanged.
- 10. UNION SECURITY agrees to be subject to the following terms and conditions with respect to the 7062-FL Inflation forms on its Comprehensive Block:
- a. The company or representatives of the company shall not implement any further rate increase on the policies in this paragraph number 10 and at issue in file log number FLR 21-012622 for a period of 8 years;
- b. The rate increase shall be implemented over a period of 3 years. The first increment shall be imposed beginning at least 45 days after the date of approval, with the following two increments imposed thereafter on or after the anniversary date of the prior year's increase, but in no event will any policyholder receive more than one rate increase within a twelve-month (consecutive) period;
- c. The amount of the rate increase will also take into account the issue age of the policyholder and the type of policy form held by each policyholder. The increases will be implemented according to the following table:

|            | First            | Year      |                  |           | Secor            | nd Year   |                  | Third Year |                  |           |                  |
|------------|------------------|-----------|------------------|-----------|------------------|-----------|------------------|------------|------------------|-----------|------------------|
| nflation F | orms: 7062       | -FL       |                  |           |                  |           |                  |            |                  |           |                  |
| Issue Age  | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age  | Rate<br>Increase | Issue Age | Rate<br>Increase |
| 18         | 26.0%            | 52        | 26.0%            | 18        | 26.0%            | 52        | 26.0%            | 18         | 26.0%            | 52        | 26.0%            |
| 19         | 26.0%            | 53        | 26.0%            | 19        | 26.0%            | 53        | 26.0%            | 19         | 26.0%            | 53        | 26.0%            |
| 20         | 26.0%            | 54        | 26.0%            | 20        | 26.0%            | 54        | 26.0%            | 20         | 26.0%            | 54        | 26.0%            |
| 21         | 26.0%            | 55        | 26.0%            | 21        | 26.0%            | 55        | 26.0%            | 21         | 26.0%            | 55        | 26.0%            |
| 22         | 26.0%            | 56        | 26.0%            | 22        | 26.0%            | 56        | 26.0%            | 22         | 26.0%            | 56        | 26.0%            |
| 23         | 26.0%            | 57        | 26.0%            | 23        | 26.0%            | 57        | 26.0%            | 23         | 26.0%            | 57        | 26.0%            |
| 24         | 26.0%            | 58        | 26.0%            | 24        | 26.0%            | 58        | 26.0%            | 24         | 26.0%            | 58        | 26.0%            |
| 25         | 26.0%            | 59        | 26.0%            | 25        | 26.0%            | 59        | 26.0%            | 25         | 26.0%            | 59        | 26.0%            |
| 26         | 26.0%            | 60        | 26.0%            | 26        | 26.0%            | 60        | 26.0%            | 26         | 26.0%            | 60        | 26.0%            |
| 27         | 26.0%            | 61        | 26.0%            | 27        | 26.0%            | 61        | 26.0%            | 27         | 26.0%            | 61        | 26.0%            |
| 28         | 26.0%            | 62        | 26.0%            | 28        | 26.0%            | 62        | 26.0%            | 28         | 26.0%            | 62        | 26.0%            |
| 29         | 26.0%            | 63        | 26.0%            | 29        | 26.0%            | 63        | 26.0%            | 29         | 26.0%            | 63        | 26.0%            |
| 30         | 26.0%            | 64        | 26.0%            | 30        | 26.0%            | 64        | 26.0%            | 30         | 26.0%            | 64        | 26.0%            |
| 31         | 26.0%            | 65        | 26.0%            | 31        | 26.0%            | 65        | 26.0%            | 31         | 26.0%            | 65        | 26.0%            |
| 32         | 26.0%            | 66        | 26.0%            | 32        | 26.0%            | 66        | 26.0%            | 32         | 26.0%            | 66        | 26.0%            |
| 33         | 26.0%            | 67        | 26.0%            | 33        | 26.0%            | 67        | 26.0%            | 33         | 26.0%            | 67        | 26.0%            |
| 34         | 26.0%            | 68        | 26.0%            | 34        | 26.0%            | 68        | 26.0%            | 34         | 26.0%            | 68        | 26.0%            |
| 35         | 26.0%            | 69        | 26.0%            | 35        | 26.0%            | 69        | 26.0%            | 35         | 26.0%            | 69        | 26.0%            |
| 36         | 26.0%            | 70        | 26.0%            | 36        | 26.0%            | 70        | 26.0%            | 36         | 26.0%            | 70        | 26.0%            |
| 37         | 26.0%            | 71        | 23.9%            | 37        | 26.0%            | 71        | 23.9%            | 37         | 26.0%            | 71        | 23.9%            |
| 38         | 26.0%            | 72        | 21.6%            | 38        | 26.0%            | 72        | 21.6%            | 38         | 26.0%            | 72        | 21.6%            |
| 39         | 26.0%            | 73        | 19.3%            | 39        | 26.0%            | 73        | 19.3%            | 39         | 26.0%            | 73        | 19.3%            |
| 40         | 26.0%            | 74        | 17.0%            | 40        | 26.0%            | 74        | 17.0%            | 40         | 26.0%            | 74        | 17.0%            |
| 41         | 26.0%            | 75        | 14.5%            | 41        | 26.0%            | 75        | 14.5%            | 41         | 26.0%            | 75        | 14.5%            |
| 42         | 26.0%            | 76        | 11.9%            | 42        | 26.0%            | 76        | 11.9%            | 42         | 26.0%            | 76        | 11.9%            |
| 43         | 26.0%            | 77        | 9.1%             | 43        | 26.0%            | 77        | 9.1%             | 43         | 26.0%            | 77        | 9.1%             |
| 44         | 26.0%            | 78        | 6.3%             | 44        | 26.0%            | 78        | 6.3%             | 44         | 26.0%            | 78        | 6.3%             |
| 45         | 26.0%            | 79        | 3.2%             | 45        | 26.0%            | 79        | 3.2%             | 45         | 26.0%            | 79        | 3.2%             |
| 46         | 26.0%            | 80        | 0.0%             | 46        | 26.0%            | 80        | 0.0%             | 46         | 26.0%            | 80        | 0.0%             |
| 47         | 26.0%            | 81        | 0.0%             | 47        | 26.0%            | 81        | 0.0%             | 47         | 26.0%            | 81        | 0.0%             |
| 48         | 26.0%            | 82        | 0.0%             | 48        | 26.0%            | 82        | 0.0%             | 48         | 26.0%            | 82        | 0.0%             |
| 49         | 26.0%            | 83        | 0.0%             | 49        | 26.0%            | 83        | 0.0%             | 49         | 26.0%            | 83        | 0.0%             |
| 50         | 26.0%            | 84        | 0.0%             | 50        | 26.0%            | 84        | 0.0%             | 50         | 26.0%            | 84        | 0.0%             |
| 51         | 26.0%            | 85        | 0.0%             | 51        | 26.0%            | 85        | 0.0%             | 51         | 26.0%            | 85        | 0.0%             |

- 11. UNION SECURITY further agrees to provide the following options to policyholders on the 7062-FL Inflation forms on its Comprehensive Block who would like to lower premium costs:
- a. Accepting a reduction in the daily benefit provided by the policy, if not already at a minimum;
- b. Accepting a reduction in the benefit period provided by the policy, if not already at a minimum;

- c. Accepting an increased elimination period under the policy, if not already at a maximum. This option would increase the policyholder's initial out of pocket cost before the policy begins to provide benefits;
- d. Accepting a reduction or removal of the inflation factor (compound or simple) provided under the policy. This option would freeze the policyholder's daily benefit amount at the currently inflated level, and alter or remove future inflation protection;
- e. Accepting a paid-up policy with maximum benefits equal to the premium paid less any claims paid. This option would exempt the policyholder from making any future premium payments. Any optional riders will terminate, and no future inflation adjustments will be made. All other policy provisions, other than the maximum benefit, would remain unchanged.
- 12. UNION SECURITY agrees to be subject to the following terms and conditions with respect to the 7062-FL Non-Inflation forms on its Comprehensive Block:
- a. The company or representatives of the company shall not implement any further rate increase on the policies in this paragraph number 12 and at issue in file log number FLR 21-012622 for a period of 8 years;
- b. The rate increase shall be implemented over a period of 3 years. The first increment shall be imposed beginning at least 45 days after the date of approval, with the following two increments imposed thereafter on or after the anniversary date of the prior year's increase, but in no event will any policyholder receive more than one rate increase within a twelve-month (consecutive) period;
- c. The amount of the rate increase will also take into account the issue age of the policyholder and the type of policy form held by each policyholder. The increases will be implemented according to the following table:

|             | First            | Year      |                  |           | Secor            | nd Year   |                  | Third Year |                  |           |                  |
|-------------|------------------|-----------|------------------|-----------|------------------|-----------|------------------|------------|------------------|-----------|------------------|
| Non- Inflat | tion Forms       | : 7062-FL |                  |           |                  |           |                  |            |                  |           |                  |
| Issue Age   | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age | Rate<br>Increase | Issue Age  | Rate<br>Increase | Issue Age | Rate<br>Increase |
| 18          | 23.9%            | 52        | 23.9%            | 18        | 23.9%            | 52        | 23.9%            | 18         | 23.9%            | 52        | 23.9%            |
| 19          | 23.9%            | 53        | 23.9%            | 19        | 23.9%            | 53        | 23.9%            | 19         | 23.9%            | 53        | 23.9%            |
| 20          | 23.9%            | 54        | 23.9%            | 20        | 23.9%            | 54        | 23.9%            | 20         | 23.9%            | 54        | 23.9%            |
| 21          | 23.9%            | 55        | 23.9%            | 21        | 23.9%            | 55        | 23.9%            | 21         | 23.9%            | 55        | 23.9%            |
| 22          | 23.9%            | 56        | 23.9%            | 22        | 23.9%            | 56        | 23.9%            | 22         | 23.9%            | 56        | 23.9%            |
| 23          | 23.9%            | 57        | 23.9%            | 23        | 23.9%            | 57        | 23.9%            | 23         | 23.9%            | 57        | 23.9%            |
| 24          | 23.9%            | 58        | 23.9%            | 24        | 23.9%            | 58        | 23.9%            | 24         | 23.9%            | 58        | 23.9%            |
| 25          | 23.9%            | 59        | 23.9%            | 25        | 23.9%            | 59        | 23.9%            | 25         | 23.9%            | 59        | 23.9%            |
| 26          | 23.9%            | 60        | 23.9%            | 26        | 23.9%            | 60        | 23.9%            | 26         | 23.9%            | 60        | 23.9%            |
| 27          | 23.9%            | 61        | 23.9%            | 27        | 23.9%            | 61        | 23.9%            | 27         | 23.9%            | 61        | 23.9%            |
| 28          | 23.9%            | 62        | 23.9%            | 28        | 23.9%            | 62        | 23.9%            | 28         | 23.9%            | 62        | 23.9%            |
| 29          | 23.9%            | 63        | 23.9%            | 29        | 23.9%            | 63        | 23.9%            | 29         | 23.9%            | 63        | 23.9%            |
| 30.         | 23.9%            | 64        | 23.9%            | 30        | 23.9%            | 64        | 23.9%            | 30         | 23.9%            | 64        | 23.9%            |
| 31          | 23.9%            | 65        | 23.9%            | 31        | 23.9%            | 65        | 23.9%            | 31         | 23.9%            | 65        | 23.9%            |
| 32          | 23.9%            | 66        | 23.9%            | 32        | 23.9%            | 66        | 23.9%            | 32         | 23.9%            | 66        | 23.9%            |
| 33          | 23.9%            | 67        | 23.9%            | 33        | 23.9%            | 67        | 23.9%            | 33         | 23.9%            | 67        | 23.9%            |
| 34          | 23.9%            | 68        | 23.9%            | 34        | 23.9%            | 68        | 23.9%            | 34         | 23.9%            | 68        | 23.9%            |
| 35          | 23.9%            | 69        | 23.9%            | 35        | 23.9%            | 69        | 23.9%            | 35         | 23.9%            | 69        | 23.9%            |
| 36          | 23.9%            | 70        | 23.9%            | 36        | 23.9%            | 70        | 23.9%            | 36         | 23.9%            | 70        | 23.9%            |
| 37          | 23.9%            | 71        | 21.9%            | 37        | 23.9%            | 71        | 21.9%            | 37         | 23.9%            | 71        | 21.9%            |
| 38          | 23.9%            | 72        | 19.8%            | 38        | 23.9%            | 72        | 19.8%            | 38         | 23.9%            | 72        | 19.8%            |
| 39          | 23.9%            | 73        | 17.7%            | 39        | 23.9%            | 73        | 17.7%            | 39         | 23.9%            | 73        | 17.7%            |
| 40          | 23.9%            | 74        | 15.5%            | 40        | 23.9%            | 74        | 15.5%            | 40         | 23.9%            | 74        | 15.5%            |
| 41          | 23.9%            | 75        | 13.2%            | 41        | 23.9%            | 75        | 13.2%            | 41         | 23.9%            | 75        | 13.2%            |
| 42          | 23.9%            | 76        | 10.8%            | 42        | 23.9%            | 76        | 10.8%            | 42         | 23.9%            | 76        | 10.8%            |
| 43          | 23.9%            | 77        | 8.3%             | 43        | 23.9%            | 77        | 8.3%             | 43         | 23.9%            | 77        | 8.3%             |
| 44          | 23.9%            | 78        | 5.7%             | 44        | 23.9%            | 78        | 5.7%             | 44         | 23.9%            | 78        | 5.7%             |
| 45          | 23.9%            | 79        | 2.9%             | 45        | 23.9%            | 79        | 2.9%             | 45         | 23.9%            | 79        | 2.9%             |
| 46          | 23.9%            | 80        | 0.0%             | 46        | 23.9%            | 80        | 0.0%             | 46         | 23.9%            | 80        | 0.0%             |
| 47          | 23.9%            | 81        | 0.0%             | 47        | 23.9%            | 81        | 0.0%             | 47         | 23.9%            | 81        | 0.0%             |
| 48          | 23.9%            | 82        | 0.0%             | 48        | 23.9%            | 82        | 0.0%             | 48         | 23.9%            | 82        | 0.0%             |
| 49          | 23.9%            | 83        | 0.0%             | 49        | 23.9%            | 83        | 0.0%             | 49         | 23.9%            | 83        | 0.0%             |
| 50          | 23.9%            | 84        | 0.0%             | 50        | 23.9%            | 84        | 0.0%             | 50         | 23.9%            | 84        | 0.0%             |
| 51          | 23.9%            | 85        | 0.0%             | 51        | 23.9%            | 85        | 0.0%             | 51         | 23.9%            | 85        | 0.0%             |

- 13. UNION SECURITY further agrees to provide the following options to policyholders on the 7062-FL Non-Inflation forms on its Comprehensive Block who would like to lower premium costs:
- a. Accepting a reduction in the daily benefit provided by the policy, if not already at a minimum;
- b. Accepting a reduction in the benefit period provided by the policy, if not already at a minimum;

- c. Accepting an increased elimination period under the policy, if not already at a maximum. This option would increase the policyholder's initial out of pocket cost before the policy begins to provide benefits;
- d. Accepting a paid-up policy with maximum benefits equal to the premium paid less any claims paid. This option would exempt the policyholder from making any future premium payments. Any optional riders will terminate, and no future inflation adjustments will be made. All other policy provisions, other than the maximum benefit, would remain unchanged.
- 14. UNION SECURITY acknowledges and agrees that all representations and requirements set forth herein are material to the issuance of this Consent Order. Violation of any provision of this Consent Order shall constitute a violation of a lawful order of the OFFICE and may subject UNION SECURITY to one or more of the administrative remedies available under the Florida Insurance Code or other applicable law.
- 15. UNION SECURITY expressly waives a hearing in this matter, the making of findings of fact and conclusions of law by the OFFICE, and all further and other proceedings herein to which it may be entitled by law or rules of the OFFICE. UNION SECURITY hereby knowingly and voluntarily waives all rights to challenge or to contest this Consent Order in any forum available to it, now or in the future, including the right to any administrative proceeding, state or federal court action, or any appeal.
- 16. UNION SECURITY expressly agrees that this Consent Order shall be binding on the company and any successor in interest. UNION SECURITY further agrees to notify any successors in interest that this Consent Order is in force.
  - 17. Each party to this action shall bear its own costs and fees.

18. The parties agree that this Consent Order shall be deemed to be executed when the OFFICE has signed and docketed a copy of this Consent Order bearing the signature of the authorized representative of UNION SECURITY, notwithstanding the fact that the copy may have been transmitted to the OFFICE electronically. UNION SECURITY agrees that the signature of its authorized representative as affixed to this Consent Order shall be under the seal of a Notary Public.

WHEREFORE, the agreement between UNION SECURITY INSURANCE COMPANY and the FLORIDA OFFICE OF INSURANCE REGULATION, the terms and conditions of which are set forth above, is APPROVED.

FURTHER, all terms and conditions contained herein are hereby ORDERED.

DONE and ORDERED this \_\_\_\_\_ day of \_\_\_\_\_\_, 2022.

By execution hereof, UNION SECURITY INSURANCE COMPANY consents to entry of this Consent Order, agrees without reservation to all of the above terms and conditions, and shall be bound by all provisions herein. The undersigned represents that they have the authority to bind UNION SECURITY INSURANCE COMPANY to the terms and conditions of this Consent Order.

| THE TOTAL STATE OF THE STATE OF | UNION SECURITY INSURANCE COMPANY                                    |
|--|---|
| SE SEAL BE   | By: Lisa Young  |
| SEAL 1910  SEAL 1910  SEAL 1910  | Print Name: Lisa Young  |
| The Management of the Control of the | Title: Vice President   |
|  | Date: 7/20/2022   |
| STATE OF _ Wisconsin   |   |
| COUNTY OF Dane   |   |
| or ☑ online notarization, this 20th d  Vice President  | (name of person)  |
| as (type of authority; e.g., officer, trustee, at  | for Union Security Insurance Company torney in fact) (company name) |
| ()1  |   |
| ncy Warner ary Public - State of Wisconsin Commission Expires Jan 22, 2025   | (Signature of the Notary) Nancy Warner                              |
| ************   | (Print, Type or Stamp Commissioned Name of Notary)                  |
| Notarial act performed by audio-visual communication   | ation   |
| Personally Known X OR Pro  | oduced Identification   |
| Type of Identification Produced  |   |
| My Commission Expires: 1/22/20   | 25  |



My Commission Expires:

## COPIES FURNISHED TO:

STEVE FASULO, Vice President – Product CUNA Mutual Group 5910 Mineral Point Road Madison, WI 53705 steve.fasulo@cunamutual.com

JOHN REILLY, Deputy Commissioner Life and Health Office of Insurance Regulation 200 East Gaines Street Tallahassee, FL 32399

JAMES DUNN, Director Life and Health Product Review Office of Insurance Regulation 200 East Gaines Street Tallahassee, Florida 32399

BENJAMIN BEN, Managing Actuarial Analyst Life and Health Product Review Office of Insurance Regulation 200 East Gaines Street Tallahassee, Florida 32399

SHANNON DOHENY, Executive Assistant General Counsel Life and Health Product Review
Office of Insurance Regulation
200 East Gaines Street
Tallahassee, Florida 32399
850-413-5110
shannon.doheny@floir.com