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User Usage Agreement Attachments

Usage Agreement [Usage Agreement.pdf](#)

Form Attachments	(ex. Form Name	Form Number	Attachment Name)
Pet Health Insurance Policy	PET00		PET00-202402 - WLPA.pdf
Accident Only Pet Health Insurance Policy	PAC00		PAC00-202402 - WLPA.pdf
Services Endorsement - Tennessee	PSE41		PSE41-202504.pdf
<i>Services Endorsement</i>	<i>PSE00</i>		PSE00-202402.pdf

Rate-Rule Attachments	(ex. Document Name	Attachment Name)
TN Pet Insurance Program		TN077PET-A.pdf

Supporting Document Attachments	(ex. Supporting Document Name	Attachment Name)
Filing Description and Cover Letter		Explanatory Memorandum.pdf
Rate Requests		Exhibit C-2 - Proposed Factor Analysis.pdf
Rate Justification for Personal Lines		Exhibit A-1 & A-2 - Rate Impacts.pdf
Rate Justification for Personal Lines		Exhibit C-1 - Use of GLM in Rating Plan Development.pdf
Rate Justification for Personal Lines		Countrywide Deductible Limit and Copay Exhibit.pdf
Rate Justification for Personal Lines		Exhibit B-1-B-9 - Rate Level Indications.pdf
<i>Rate Justification for Personal Lines</i>		Exhibit A-1 & A-2 - Rate Impacts.pdf
<i>Rate Justification for Personal Lines</i>		Exhibit B1-B7 - Rate Level Indications.pdf
<i>Rate Justification for Personal Lines</i>		Exhibit C-1 - Use of GLM in Rating Plan Development.pdf
<i>Rate Justification for Personal Lines</i>		Countrywide Deductible Limit and Copay Exhibit.pdf

Redlined Attachments [PET00-202401 vs PET00-202402.pdf](#)

Redlined Attachments [PAC00-202401 vs PAC00-202402.pdf](#)

Redlined Attachments	Filing Manual Comparison.pdf
Rate/Rule Checklist	Rate Rule Checklist.pdf
Rate/Rule Checklist	Checklist Supporting Exhibit - Item 9.pdf
Reply to Objection of 04-15-2025	Reply to Objection of 04-15-2025.pdf
Reply to Objection of 04-15-2025	PH TN Exhibits.pdf
Reply to Objection of 05-01-2025	Tennessee Policy Increases and Decreases.pdf
Correspondence Attachments	(ex. Correspondence Type Attachment Name)
Reviewer Note	IntakeReport_AMMH-134489975.pdf
Reviewer Note	IntakeReport_AMMH-134489975 (1).pdf

Filing at a Glance

Company:	American Modern Home Insurance Company
Product Name:	Pet Insurance Program
State:	Tennessee
TOI:	09.0 Inland Marine
Sub-TOI:	09.0004 Pet Insurance Plans
Filing Type:	Form/Rate/Rule
Date Submitted:	04/11/2025
SERFF Tr Num:	AMMH-134489975
SERFF Status:	Pending State Action
State Tr Num:	251014
State Status:	Pending-Actuarial Review
Co Tr Num:	PH-TN-2025JAN17-02
Effective Date	07/19/2025
Requested (New):	
Effective Date	07/19/2025
Requested (Renewal):	
Author(s):	Rachael Yaroshevich
Reviewer(s):	Katie Koch (primary), Devon Suttles, Will Garrett
Disposition Date:	
Disposition Status:	
Effective Date (New):	
Effective Date (Renewal):	

General Information

Project Name: Rate/Rule/Form Revisions
Project Number: PH-TN-2025JAN17-02
Reference Organization:
Reference Title:
Filing Status Changed: 05/06/2025
State Status Changed: 04/15/2025
Created By: Rachael Yaroshevich
Corresponding Filing Tracking Number:

Status of Filing in Domicile:
Domicile Status Comments:
Reference Number:
Advisory Org. Circular:

Deemer Date:
Submitted By: Rachael Yaroshevich

Filing Description:

American Modern Home Insurance Company presents revisions to our Pet Insurance Program. Please see the Explanatory Memorandum under the Supporting Documentation tab for complete details.

Company and Contact

Filing Contact Information

Rachael Yaroshevich ,	ryaroshevich@amig.com
7000 Midland Blvd	513-947-6979 [Phone]
Amelia, OH 45102	

Filing Company Information

American Modern Home Insurance Company	CoCode: 23469	State of Domicile: Ohio
7000 Midland Blvd.	Group Code: 361	Company Type: Property and Casualty
Amelia, OH 45102	Group Name: Munich Re	State ID Number:
(800) 759-9008 ext. [Phone]	FEIN Number: 31-0715697	

Filing Fees

State Fees

Fee Required? Yes

Fee Amount: \$50.00

Retaliatory? Yes

Fee Explanation: OH is the state of domicile, the retaliatory fee is \$50.00 per filing.

Per Company: Yes

Company	Amount	Date Processed	Transaction #
American Modern Home Insurance Company	\$50.00	04/11/2025 08:39 AM	313367920
EFT Total	\$50.00		

State Specific

Have you read the Filing Rules?: Yes

Have you read the Filing Requirements?: Yes

If submitting a rate filing, have you completed the Rate Tab in full?: Yes

Have you completed the Rate/Rule Checklist?: Yes

Have you submitted all relevant filing fees?: Yes

Correspondence Summary

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Industry Response	Katie Koch	05/01/2025	05/01/2025
Pending Industry Response	Devon Suttles	04/15/2025	04/15/2025

Response Letters

Responded By	Created On	Date Submitted
Rachael Yaroshevich	05/06/2025	05/06/2025
Rachael Yaroshevich	04/29/2025	04/29/2025

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Filing Status	Note To Filer	Devon Suttles	05/20/2025	05/20/2025
Filing Status	Note To Reviewer	Rachael Yaroshevich	05/20/2025	05/20/2025
Model Filing Requirements	Note To Filer	Devon Suttles	04/22/2025	04/22/2025
Request for Additional Information - Model	Note To Reviewer	Rachael Yaroshevich	04/21/2025	04/21/2025
Intake Validation Report_04-29-2025_09:05:18	Reviewer Note	Verisk User	04/29/2025	
Comments	Reviewer Note	Will Garrett	04/11/2025	
Intake Validation Report_04-11-2025_09:35:18	Reviewer Note	Verisk User	04/11/2025	

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	05/01/2025
Submitted Date	05/01/2025
Respond By Date	05/15/2025

Dear Rachael Yaroshevich ,

Introduction:

The following issues must be addressed before we can proceed:

Objection 1

- Rate Justification for Personal Lines (Supporting Document)

Comments: Please provide additional support for the selected veterinary inflation factor of 13% applied to trended current level earned premium. We see a high-level explanation, but additional detail to support the number and its impact on the indication is requested.

Objection 2

- Rate Justification for Personal Lines (Supporting Document)

Comments: Please provide support for the premium and loss trend analysis underlying the rate indication.

Objection 3

- Rate Requests (Supporting Document)

- Rate Justification for Personal Lines (Supporting Document)

Comments: Please provide current and proposed policy characteristics for policyholders receiving the largest 3 increases and the largest 3 decreases.

Objection 4

- Rate Justification for Personal Lines (Supporting Document)

Comments: Regarding the rate level indication analysis, please disclose any change to the methodology or approach to selecting actuarial assumptions since the prior filing which shows a +0.6% indicated rate need estimate.

Conclusion:

Please respond promptly.

Sincerely,

Katie Koch

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	04/15/2025
Submitted Date	04/15/2025
Respond By Date	04/29/2025

Dear Rachael Yaroshevich ,

Introduction:

The following issues must be addressed before we can proceed:

Objection 1

- Services Endorsement, PSE00, (02/24) (Form)

Comments: Please note that per TCA § 56-8-104 (8), any valuable consideration must be specified in the policy. The department views this as a directive for insurance companies to file specific named valuable considerations (goods or services) when those services are available, and the use of blanket statements is not sufficient to achieve compliance.

While this blanket statement is sufficient for notice to policyholders, amendments or separate forms will need to be filed when the valuable considerations are available.

Are there specific goods or services the company intends to offer now? If so, they need to be filed.

Objection 2

- Rate Justification for Personal Lines (Supporting Document)

Comments: Has the GLM referenced in this document been submitted and approved in TN? If not, please submit.

Conclusion:

Please respond promptly.

Sincerely,

Devon Suttles

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/06/2025
Submitted Date	05/06/2025

Dear Katie Koch,

Introduction:

Thank you for your correspondence, our reply follows below.

Response 1

Comments:

Our selected veterinary inflation factor is 7%, in line with national vet services indices and same as our prior filings. The 1.13 factor comes from applying the inflation factor from our most recent data end date (9/30/2024 in this filing) to the end of our prospective trending period, which is the average written date in the proposed effective period (7/19/2026). This results in our applied inflation factor being $1.07^{(1.80 \text{ years})} = 1.13$

Related Objection 1

Applies To:

- *Rate Justification for Personal Lines (Supporting Document)*

Comments: Please provide additional support for the selected veterinary inflation factor of 13% applied to trended current level earned premium. We see a high-level explanation, but additional detail to support the number and its impact on the indication is requested.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 2

Comments:

Please see revised Exhibit B-1-B-9 Rate Level Indications, which include premium and loss trend analyses, these exhibits are located on the Supporting Documentation tab under the component "Rate Justification for Personal Line".

Related Objection 2

Applies To:

- *Rate Justification for Personal Lines (Supporting Document)*

Comments: Please provide support for the premium and loss trend analysis underlying the rate indication.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Justification for Personal Lines
Comments:	
Attachment(s):	Exhibit A-1 & A-2 - Rate Impacts.pdf Exhibit C-1 - Use of GLM in Rating Plan Development.pdf Exhibit B-1-B-9 - Rate Level Indications.pdf Countrywide Deductible Limit and Copay Exhibit.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Rate Justification for Personal Lines</i>
Comments:	
Attachment(s):	<i>Exhibit A-1 & A-2 - Rate Impacts.pdf Exhibit B1-B7 - Rate Level Indications.pdf Exhibit C-1 - Use of GLM in Rating Plan Development.pdf Countrywide Deductible Limit and Copay Exhibit.pdf</i>

Response 3

Comments:

Please see the Tennessee Policy Increases and Decreases exhibit attached on the Supporting Documentation tab under the component "Reply to Objection of 05-01-2025".

Related Objection 3

Applies To:

- Rate Requests (Supporting Document)*
- Rate Justification for Personal Lines (Supporting Document)*

Comments: Please provide current and proposed policy characteristics for policyholders receiving the largest 3 increases and the largest 3 decreases.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Reply to Objection of 05-01-2025
Comments:	
Attachment(s):	Tennessee Policy Increases and Decreases.pdf

Response 4

Comments:

The methodology behind calculating our indicated rate need has not changed. The primary driver of the increase in the indication is a deterioration in experience.

Related Objection 4

Applies To:

- Rate Justification for Personal Lines (Supporting Document)

Comments: Regarding the rate level indication analysis, please disclose any change to the methodology or approach to selecting actuarial assumptions since the prior filing which shows a +0.6% indicated rate need estimate.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you for your time and attention to this matter.

Sincerely,

Rachael Yaroshevich

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	04/29/2025
Submitted Date	04/29/2025

Dear Katie Koch,

Introduction:

Thank you for your correspondence, our reply follows below.

Response 1

Comments:

Per the objection, we have updated the form PSE41 to a State Specific form. Please see the updated PSE41 Services Endorsement - Tennessee (04/2025) on the Forms Schedule tab.

Related Objection 1

Applies To:

- Services Endorsement, PSE00, (02/24) (Form)

Comments: Please note that per TCA § 56-8-104 (8), any valuable consideration must be specified in the policy. The department views this as a directive for insurance companies to file specific named valuable considerations (goods or services) when those services are available, and the use of blanket statements is not sufficient to achieve compliance.

While this blanket statement is sufficient for notice to policyholders, amendments or separate forms will need to be filed when the valuable considerations are available.

Are there specific goods or services the company intends to offer now? If so, they need to be filed.

Changed Items:

Form Schedule Item Changes									
Item No.	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data	Readability Score	Attachments	Submitted
1	Services Endorsement - Tennessee	PSE41	(04/25)	END	New			PSE41-202504.pdf	Date Submitted: 04/29/2025 By: Rachael Yaroshevich
<i>Previous Version</i>									
1	Services Endorsement	PSE00	(02/24)	END	New			PSE00-202402.pdf	Date Submitted: 04/11/2025 By: Rachael Yaroshevich

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 2

Comments:

Please see the component "Reply to Objection of 04-15-2025" located on the Supporting Documentation tab for more details.

Related Objection 2

Applies To:

- Rate Justification for Personal Lines (Supporting Document)

Comments: Has the GLM referenced in this document been submitted and approved in TN? If not, please submit.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Reply to Objection of 04-15-2025
Comments:	
Attachment(s):	Reply to Objection of 04-15-2025.pdf PH TN Exhibits.pdf

Conclusion:

Thank you for your time and attention to this matter.

Sincerely,

Rachael Yaroshevich

Note To Filer

Created By:

Devon Suttles on 05/20/2025 04:43 PM

Last Edited By:

Devon Suttles

Submitted On:

05/20/2025 04:43 PM

Subject:

Filing Status

Comments:

Thank you for reaching out. The filing is currently under review and we hope to have more information soon.

Note To Reviewer

Created By:

Rachael Yaroshevich on 05/20/2025 12:37 PM

Last Edited By:

Rachael Yaroshevich

Submitted On:

05/20/2025 12:37 PM

Subject:

Filing Status

Comments:

Hello,

We would like to request a filing status update.

Thank you!

Note To Filer

Created By:

Devon Suttles on 04/22/2025 11:24 AM

Last Edited By:

Devon Suttles

Submitted On:

04/22/2025 11:24 AM

Subject:

Model Filing Requirements

Comments:

If the model has not been submitted for review and approved for use in TN, it will need to be submitted in full for review as part of this filing. If the model has been submitted and approved, we simply need SERFF tracking information.

Additionally, there exists information on our Filing Rules page for confidential/trade secret materials, if the model needs to be submitted and contains any non-public aspects.

Note To Reviewer

Created By:

Rachael Yaroshevich on 04/21/2025 02:00 PM

Last Edited By:

Rachael Yaroshevich

Submitted On:

04/21/2025 02:00 PM

Subject:

Request for Additional Information - Model

Comments:

Hello,

I am reaching out in regards to objection #2 received on 4-15-2025. We've researched and are unable to find specific model filing submission requirements. Are you able to provide guidance on how and what should be submitted?

Thank you!

Reviewer Note

Created By:

Verisk User on 04/29/2025 09:05 AM

Subject:

Intake Validation Report_04-29-2025_09:05:18

Comments:

Reviewer Note

***Attachment IntakeReport_AMMH-134489975.pdf could not be reproduced here
for the following reason: PDF header signature not found.***

Reviewer Note

Created By:

Will Garrett on 04/11/2025 03:43 PM

Subject:

Comments

Comments:

Mention of benefits, are they being offered to all?

1943 25%+, capping at 60%

Has the GLM been approved?

Reviewer Note

Created By:

Verisk User on 04/11/2025 09:35 AM

Subject:

Intake Validation Report_04-11-2025_09:35:18

Comments:

Reviewer Note

***Attachment IntakeReport_AMMH-134489975.pdf could not be reproduced here
for the following reason: PDF header signature not found.***

Form Schedule

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
1		Pet Health Insurance Policy	PET00	(02/24)	PCF	Replaced	Previous Filing Number:	AMMH-133851424		PET00-202402 - WLPA.pdf
							Replaced Form Number:	PET00		
							Replaced Edition Date:	(01/24)		
2		Accident Only Pet Health Insurance Policy	PAC00	(02/24)	PCF	Replaced	Previous Filing Number:	AMMH-133851424		PAC00-202402 - WLPA.pdf
							Replaced Form Number:	PAC00		
							Replaced Edition Date:	(01/24)		
3		Services Endorsement - Tennessee	PSE41	(04/25)	END	New				PSE41-202504.pdf

Form Type Legend:

ABE	Application/Binder/Enrollment	ADV	Advertising
BND	Bond	CER	Certificate
CNR	Canc/NonRen Notice	DEC	Declarations/Schedule
DSC	Disclosure/Notice	END	Endorsement/Amendment/Conditions
ERS	Election/Rejection/Supplemental Applications	OTH	Other

Rate Information

Rate data applies to filing.

Filing Method:	Prior Approval
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	0.600%
Effective Date of Last Rate Revision:	04/02/2024
Filing Method of Last Filing:	Prior Approval
SERFF Tracking Number of Last Filing:	AMMH-133851424

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
American Modern Home Insurance Company	24.500%	24.500%	\$1,072,801	4,712	\$4,371,544	535.000%	-27.000%

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		TN Pet Insurance Program	See amended pages attached	Replacement	AMMH-133851424	TN077PET-A.pdf

Supporting Document Schedules

Bypassed - Item:	Third Party Authorization
Bypass Reason:	N/A - Not applicable
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Filing Description and Cover Letter
Comments:	
Attachment(s):	Explanatory Memorandum.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Fraud Warning
Comments:	We comply
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Investment Income
Comments:	Please see indications attached under Rate Justification for Personal Lines
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Rate Requests
Comments:	
Attachment(s):	Exhibit C-2 - Proposed Factor Analysis.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Rate Justification for Personal Lines
Comments:	
Attachment(s):	Exhibit A-1 & A-2 - Rate Impacts.pdf Exhibit C-1 - Use of GLM in Rating Plan Development.pdf Exhibit B-1-B-9 - Rate Level Indications.pdf Countrywide Deductible Limit and Copay Exhibit.pdf

Item Status:	
Status Date:	
Satisfied - Item:	Redlined Attachments
Comments:	
Attachment(s):	PET00-202401 vs PET00-202402.pdf PAC00-202401 vs PAC00-202402.pdf Filing Manual Comparison.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Rate/Rule Checklist
Comments:	
Attachment(s):	Rate Rule Checklist.pdf Checklist Supporting Exhibit - Item 9.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Reply to Objection of 04-15-2025
Comments:	
Attachment(s):	Reply to Objection of 04-15-2025.pdf PH TN Exhibits.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Reply to Objection of 05-01-2025
Comments:	
Attachment(s):	Tennessee Policy Increases and Decreases.pdf
Item Status:	
Status Date:	

Superseded Schedule Items

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

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
04/08/2025		Supporting Document	Rate Justification for Personal Lines	05/06/2025	Exhibit A-1 & A-2 - Rate Impacts.pdf Exhibit B1-B7 - Rate Level Indications.pdf (Superceded) Exhibit C-1 - Use of GLM in Rating Plan Development.pdf Countrywide Deductible Limit and Copay Exhibit.pdf
04/08/2025		Form	Services Endorsement	04/29/2025	PSE00-202402.pdf (Superceded)