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Usage Agreement

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Rate-Rule Attachments

(ex. Document Name

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ACE American Insurance Company
Pet Insurance - Inland Marine Rate
and Rating Manual Maryland

[Healthy Paws Rate Manual MD 1.0 2024 clean_v2.pdf](#)

ACE American Insurance Company
Pet Insurance - Inland Marine Rate
and Rating Manual Maryland

[Healthy Paws Rate Manual MD 1.0 2024 redline_v2.pdf](#)

*ACE American Insurance
Company Pet Insurance - Inland
Marine Rate and Rating Manual
Maryland*

[Healthy Paws Rate Manual MD 1.0 2024 clean.pdf](#)

*ACE American Insurance
Company Pet Insurance - Inland
Marine Rate and Rating Manual
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[Healthy Paws Rate Manual MD 1.0 2024 redline.pdf](#)

Supporting Document

Attachments

(ex. Supporting Document Name

Attachment Name)

P&C Actuarial Justification

[Actuarial Memorandum -- 1.0 MD 2024.pdf](#)

P&C Actuarial Justification

[MD - 1.0 indication 202406.pdf](#)

P&C Actuarial Justification

[PLR Support 2023 - Healthy Paws 1.pdf](#)

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Updated rate info

[MD 1.0 updated rate numbers.pdf](#)

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P&C Actuarial Justification

[PLR Support 2023 - Healthy Paws 1.pdf](#)

Filing at a Glance

Company:	ACE American Insurance Company
Product Name:	Healthy Paws
State:	Maryland
TOI:	09.0 Inland Marine
Sub-TOI:	09.0004 Pet Insurance Plans
Filing Type:	Rate/Rule
Date Submitted:	09/10/2024
SERFF Tr Num:	ACEH-134240687
SERFF Status:	Pending State Action
State Tr Num:	09102024
State Status:	Referred to Actuary
Co Tr Num:	24-PIM-2024427
Effective Date Requested (New):	
Effective Date Requested (Renewal):	11/22/2024
Author(s):	Alisa Olszyk, Karen Mera, Denise Panik
Reviewer(s):	Shirley Corbin (primary), Sam Mullick
Disposition Date:	
Disposition Status:	
Effective Date (New):	
Effective Date (Renewal):	

General Information

Project Name: Healthy Paws 1.0 Rate Rule Filing

Project Number:

Reference Organization:

Reference Title:

Filing Status Changed: 05/12/2025

State Status Changed: 09/10/2024

Created By: Alisa Olszyk

Corresponding Filing Tracking Number:

Status of Filing in Domicile: Authorized

Domicile Status Comments:

Reference Number:

Advisory Org. Circular:

Deemer Date:

Submitted By: Alisa Olszyk

Filing Description:

ACE American Insurance Company ("the Company") is filing a revision to its Pet Health program filed under the Inland Marine line of business and Pet Insurance Plan sub-line.

There are two elements addressed with this filing.

1.To increase the Base Rates by 18.6% to reflect the increase in average claim costs.

2.Add breeds that were missing from the rating manual. The breeds were bucketed based on similar breeds that were previously in the rating manual.

The overall rate level indication of 44.9% was calculated on an effective year basis using the program's experience.

Regarding the determination of the overall rate level we analyzed the experience as follows:

- Developed Maryland losses to ultimate using historical development patterns.
- Trended developed losses and premium to prospective level. Actual countrywide experience for the program is utilized to support trend assumptions.
- On-leveled premium to the current rates and factors by rerating individual pets.

The impact of raising the Base Rates is 18.0% (note that this is slightly lower than 18.6% due to the additive administrative expense fee).

The "Number of Policyholders Affected" figure entered in the SERFF Rate Information section represents the number of pets in-force in June 2024. The "Written Premium for this Program" figure represents the annualized premium associated for these in-force pets.

Please see our attached proposed rating manual and redlined version. The Company respectfully requests that the proposed rates and rules be implemented for all policies effective 11/22/2024.

Company and Contact

Filing Contact Information

Alisa Olszyk, Product Filing Specialist

202 Halls Mills Rd

Location A

Whitehouse Station, NJ 08889

Alisa.Olszyk@chubb.com

908-572-3205 [Phone]

Filing Company Information

ACE American Insurance
Company

PO Box 1000

436 Walnut Street

Philadelphia, PA 19106

(215) 640-1811 ext. [Phone]

CoCode: 22667

Group Code: 626

Group Name: Chubb

FEIN Number: 95-2371728

State of Domicile:

Pennsylvania

Company Type: Stock

State ID Number:

Filing Fees

State Fees

Fee Required? Yes
Fee Amount: \$125.00
Retaliatory? No
Fee Explanation: \$125 x 1 company
Per Company: Yes

Company	Amount	Date Processed	Transaction #
ACE American Insurance Company	\$125.00	09/10/2024 09:29 AM	294743326
EFT Total	\$125.00		

State Specific

Upon your submission of this filing, does this filing meet our filing requirements listed in the GENERAL INSTRUCTIONS?: Yes

Correspondence Summary

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Industry Response	Shirley Corbin	04/29/2025	04/29/2025

Response Letters

Responded By	Created On	Date Submitted
Alisa Olszyk	05/09/2025	05/12/2025

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Question #2	Note To Reviewer	Alisa Olszyk	05/09/2025	05/09/2025
Question	Note To Reviewer	Alisa Olszyk	05/09/2025	05/09/2025
Effective Date	Note To Reviewer	Alisa Olszyk	02/19/2025	02/19/2025
File and use	Note To Reviewer	Alisa Olszyk	02/19/2025	02/19/2025
Follow Up	Note To Reviewer	Alisa Olszyk	02/18/2025	02/18/2025
Follow Up	Note To Filer	Shirley Corbin	02/03/2025	02/03/2025
Follow Up	Note To Reviewer	Alisa Olszyk	01/23/2025	01/23/2025
Follow Up	Note To Filer	Shirley Corbin	01/02/2025	01/02/2025
Follow Up	Note To Reviewer	Alisa Olszyk	12/23/2024	12/23/2024
Follow Up	Note To Filer	Shirley Corbin	12/03/2024	12/03/2024
Follow Up	Note To Reviewer	Alisa Olszyk	12/02/2024	12/02/2024
Follow Up	Note To Filer	Shirley Corbin	11/18/2024	11/18/2024
Follow Up	Note To Reviewer	Alisa Olszyk	11/13/2024	11/13/2024
Follow Up	Note To Reviewer	Alisa Olszyk	10/23/2024	10/23/2024

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	04/29/2025
Submitted Date	04/29/2025
Respond By Date	05/13/2025

Dear Alisa Olszyk,

Introduction:

The Maryland Insurance Administration ("MIA") has received and reviewed your submission dated 09/04/2024. However, the review of filing has been suspended, for further consideration of this submission please provide and/or modify the following:

Objection 1

- ACE American Insurance Company Pet Insurance - Inland Marine Rate and Rating Manual – Maryland , Pgs 1-17 (Rate)

Comments: Administrative Expense Fee

In accordance with §27-216(b)(3)(ii)2., Administrative Expense Fee are not applicable, the only applicable fees are Late and Installments. Please amend to remove all instances to Administrative Expense Fee Rule and Rate.

However, Expense Constant are allowed. Actuary Actuarial Justification and Support must be provided.

Conclusion:

Please provide the requested information by May 13, 2025. Thank you in advance for your prompt attention in this matter. Should have any questions, concerns and/or need clarification in this matter, please feel free to contact me @ 410-468-2316.

Sincerely,

Shirley Corbin

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/09/2025
Submitted Date	05/12/2025

Dear Shirley Corbin,

Introduction:

Response 1

Comments:

Please see revised rating manual, where we have removed the Administrative Expense Fee. In order to make up for this rate decrease, we have adjusted the base rates to get back to the overall impact of 18.0%. Please also see attached revised histogram. Please also see updated rate info attached as a supporting document.

Related Objection 1

Applies To:

- ACE American Insurance Company Pet Insurance - Inland Marine Rate and Rating Manual Maryland , Pgs 1-17 (Rate)

Comments: Administrative Expense Fee

In accordance with §27-216(b)(3)(ii)2., Administrative Expense Fee are not applicable, the only applicable fees are Late and Installments. Please amend to remove all instances to Administrative Expense Fee Rule and Rate.

However, Expense Constant are allowed. Actuary Actuarial Justification and Support must be provided.

Changed Items:

No Form Schedule items changed.

Rate Schedule Item Changes					
Item No.	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Date Submitted
1	ACE American Insurance Company Pet Insurance - Inland Marine Rate and Rating Manual – Maryland	Pgs 1-17	Replacement	ACEH-133777455	05/12/2025 By: Alisa Olszyk
<i>Previous Version</i>					
1	ACE American Insurance Company Pet Insurance - Inland Marine Rate and Rating Manual – Maryland	Pgs 1-17	Replacement	ACEH-133777455	09/10/2024 By: Alisa Olszyk

Supporting Document Schedule Item Changes	
Satisfied - Item:	P&C Actuarial Justification
Comments:	
Attachment(s):	Actuarial Memorandum -- 1.0 MD 2024.pdf MD - 1.0 indication 202406.pdf PLR Support 2023 - Healthy Paws 1.pdf MD 1.0 histograms 202406_v2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>P&C Actuarial Justification</i>
Comments:	
Attachment(s):	<i>Actuarial Memorandum -- 1.0 MD 2024.pdf MD - 1.0 indication 202406.pdf MD 1.0 histograms 2024.pdf PLR Support 2023 - Healthy Paws 1.pdf</i>

Supporting Document Schedule Item Changes	
Satisfied - Item:	P&C Actuarial Justification
Comments:	
Attachment(s):	Actuarial Memorandum -- 1.0 MD 2024.pdf MD - 1.0 indication 202406.pdf PLR Support 2023 - Healthy Paws 1.pdf MD 1.0 histograms 202406_v2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>P&C Actuarial Justification</i>
Comments:	
Attachment(s):	<i>Actuarial Memorandum -- 1.0 MD 2024.pdf MD - 1.0 indication 202406.pdf MD 1.0 histograms 2024.pdf PLR Support 2023 - Healthy Paws 1.pdf</i>
Satisfied - Item:	Updated rate info
Comments:	
Attachment(s):	MD 1.0 updated rate numbers.pdf

Conclusion:

Sincerely,
Alisa Olszyk

Note To Reviewer

Created By:

Alisa Olszyk on 05/09/2025 12:05 PM

Last Edited By:

Alisa Olszyk

Submitted On:

05/09/2025 12:05 PM

Subject:

Question #2

Comments:

Good afternoon, Since you do not accept post submission updates, please advise how we can change submitted rate information in response to the objection. Thank you.

Note To Reviewer

Created By:

Alisa Olszyk on 05/09/2025 11:48 AM

Last Edited By:

Alisa Olszyk

Submitted On:

05/09/2025 12:01 PM

Subject:

Question

Comments:

Hello, per our Note to Reviewer submitted on 2/19/2025 we have implemented this Rate/Rule filing as file and use under 11-307. Our response to the objection received 4/29/2025 (response submitted 5/9/2025) resulted in rating adjustments. Please advise how we should address these adjustments with impacted policyholders. Thank you.

Note To Reviewer

Created By:

Alisa Olszyk on 02/19/2025 02:47 PM

Last Edited By:

Alisa Olszyk

Submitted On:

02/19/2025 02:47 PM

Subject:

Effective Date

Comments:

My apologies, We are also changing the effective date of this filing to 5/2/25. Thank you.

Note To Reviewer

Created By:

Alisa Olszyk on 02/19/2025 02:46 PM

Last Edited By:

Alisa Olszyk

Submitted On:

02/19/2025 02:46 PM

Subject:

File and use

Comments:

We would like to notify you that Chubb will be implementing this Rate/Rule filing as rates and rules are file and use under 11-307. Thank you.

Note To Reviewer

Created By:

Alisa Olszyk on 02/18/2025 12:07 PM

Last Edited By:

Alisa Olszyk

Submitted On:

02/18/2025 12:07 PM

Subject:

Follow Up

Comments:

Good afternoon, Are there any additional updates to the status of this filing? Thank you!

Note To Filer

Created By:

Shirley Corbin on 02/03/2025 11:26 AM

Last Edited By:

Shirley Corbin

Submitted On:

02/03/2025 11:26 AM

Subject:

Follow Up

Comments:

Good afternoon Alisa,

Thank you, for your request on the status on this filing. The filing is being reviewed by our Actuary. We have had some staffing confines and are working vigorously at file review.

Should you have any further concerns, please free to contact us.

Thank you for your patience in this matter.

Note To Reviewer

Created By:

Alisa Olszyk on 01/23/2025 08:33 AM

Last Edited By:

Alisa Olszyk

Submitted On:

01/23/2025 08:33 AM

Subject:

Follow Up

Comments:

Good morning, Are there any additional updates to the status of this filing .Thank you!

Note To Filer

Created By:

Shirley Corbin on 01/02/2025 09:59 AM

Last Edited By:

Shirley Corbin

Submitted On:

01/02/2025 09:59 AM

Subject:

Follow Up

Comments:

Good morning Alisa,

Thank you, for your request on the status on this filing. We have had some staffing confines and are working vigorously at file review.

Should you have any further concerns, please free to contact us.

Thank you for your patience in this matter.

Note To Reviewer

Created By:

Alisa Olszyk on 12/23/2024 11:25 AM

Last Edited By:

Alisa Olszyk

Submitted On:

12/23/2024 11:25 AM

Subject:

Follow Up

Comments:

Good morning, are there any additional updates to the status of this filing .Thank you!

Note To Filer

Created By:

Shirley Corbin on 12/03/2024 05:33 PM

Last Edited By:

Shirley Corbin

Submitted On:

12/03/2024 05:33 PM

Subject:

Follow Up

Comments:

Good afternoon Alisa,

Thank you, for your request on the status on this filing.

We have had some staffing confines and are working vigorously at file review.

Should you have any further concerns, please free to contact us.

Thank you for your patience in this matter.

Note To Reviewer

Created By:

Alisa Olszyk on 12/02/2024 08:10 AM

Last Edited By:

Alisa Olszyk

Submitted On:

12/02/2024 08:10 AM

Subject:

Follow Up

Comments:

Good morning, are there any additional updates to the status of this filing .Thank you!

Note To Filer

Created By:

Shirley Corbin on 11/18/2024 12:06 PM

Last Edited By:

Shirley Corbin

Submitted On:

11/18/2024 12:06 PM

Subject:

Follow Up

Comments:

Good afternoon Olszyk,

Thank you, for your request on the status on this filing.

We have had some staffing confines and are working vigorously at file review.

Thank you for your patience in this matter.

Note To Reviewer

Created By:

Alisa Olszyk on 11/13/2024 07:43 AM

Last Edited By:

Alisa Olszyk

Submitted On:

11/13/2024 07:43 AM

Subject:

Follow Up

Comments:

Please advise the status of this filing as it was submitted 9/10. Thank you!

Note To Reviewer

Created By:

Alisa Olszyk on 10/23/2024 12:09 PM

Last Edited By:

Alisa Olszyk

Submitted On:

10/23/2024 12:09 PM

Subject:

Follow Up

Comments:

Please advise the status of this filing as it was submitted 9/10. Thank you!

Rate Information

Rate data applies to filing.

Filing Method:	Prior Approval
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	30.000%
Effective Date of Last Rate Revision:	11/22/2023
Filing Method of Last Filing:	Prior Approval
SERFF Tracking Number of Last Filing:	ACEH-133777455

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):
ACE American Insurance Company	44.900%	18.000%	\$320,607	625	\$1,781,410	18.400%	16.400%

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		ACE American Insurance Company Pet Insurance - Inland Marine Rate and Rating Manual Maryland	Pgs 1-17	Replacement	ACEH-133777455	Healthy Paws Rate Manual MD 1.0 2024 clean_v2.pdf Healthy Paws Rate Manual MD 1.0 2024 redline_v2.pdf

Supporting Document Schedules

Satisfied - Item:	P&C Actuarial Justification
Comments:	
Attachment(s):	Actuarial Memorandum -- 1.0 MD 2024.pdf MD - 1.0 indication 202406.pdf PLR Support 2023 - Healthy Paws 1.pdf MD 1.0 histograms 202406_v2.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Commercial Guide
Comments:	Acknowledged
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	P&C Third Party Filing Authorization
Bypass Reason:	n/a
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Updated rate info
Comments:	
Attachment(s):	MD 1.0 updated rate numbers.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)
09/10/2024		Rate	ACE American Insurance Company Pet Insurance - Inland Marine Rate and Rating Manual – Maryland	05/09/2025	Healthy Paws Rate Manual MD 1.0 2024 clean.pdf (Superceded) Healthy Paws Rate Manual MD 1.0 2024 redline.pdf (Superceded)
09/09/2024		Supporting Document	P&C Actuarial Justification	05/09/2025	Actuarial Memorandum -- 1.0 MD 2024.pdf MD - 1.0 indication 202406.pdf MD 1.0 histograms 2024.pdf (Superceded) PLR Support 2023 - Healthy Paws 1.pdf