

Dispute
RESOLUTION
Center
OF THURSTON COUNTY



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September 25, 2013

Devin Proctor, Rules and Policy Coordinator
Department of Enterprise Services
Contracts and Legal Services Division
PO Box 41410
Olympia, WA 98504-1410

RE: Comments – CR 102 DES Proposed Rule making

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Dear Mr. Proctor:

As a very small non-profit agency that receives comprehensive insurance coverage from an insurance pool managed through Canfield, I want to urge you and your associates to not cave into the request generated by a member pool representative of the committee and not by the members of the committee as a whole. My understanding is that the rule change would cause our rates to go way up which would defeat the very purpose of the pooled insurance and cause a big hardship for our agency and all other non-profits who already are under severe economic stress in meeting our bottom lines.

The role of the DES committee is to help guide rule making that provides sufficient oversight, appropriate competition and at the same time allows maximum flexibility through member voted representation. It should not be the role of DES to decide through rule making which pooling model they will support.

The rule changes would be contrary to the intent of the original legislation and are certainly not in the best interests of the non-profit community. We respectfully request that the rules remain as written and that DES staff look into the reasons that staff thought it was necessary to bring these rule changes forward.

Sincerely,

Executive Director

Evan Ferber

Evan Ferber, Director
Dispute Resolution Center of Thurston County