



*For Nonprofits, by Nonprofits.*

**TO:** Shannon Stuber, Program Administrator

**FROM:** NPIP

**RE:** **Proposed Changes to WAC 200-100 Self-Insurance Requirements as to Local Governments and Nonprofit Corporations.**

Thank you for the opportunity to respond to proposed changes to WAC 200-100. NPIP is grateful for the acknowledgement that nonprofits should be treated the same as the other pools recognized by RCW 48.62. However, we do not believe that any changes to the current WACs are necessary. There has been little time since your office's last proposed changes to determine the effectiveness of the previous revisions. To date, there is still not a definition of a problem, nor an understanding of how current WACs fall short of addressing any potential problems that arise. As has been state at the various WRAC meetings, WAC changes should only be made to address an identified problem or new circumstances. Further, WAC changes cannot further legislate beyond the intent of the governing RCW.

Although it does not directly affect us at this time, until another nonprofit pool is formed, we concur with the SIAW, USIP, CIAW, and WRCIP that additional focus be placed upon membership notification requirements. If the intent of this WAC is to provide information in a timely way so a member has all the information it needs to withdraw from a pool, then the notification for withdrawal should not be longer than one (1) year. We believe the other pools mentioned above are submitting some draft language.

Thank you again for the opportunity to respond to proposed changes to WAC language.