

August 26, 2013

Devin Proctor  
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RE: Chapter 200-100 WAC  
Self-insurance requirements governing local government and nonprofit self-insurance

The Washington Schools Risk Management Pool is a jointly funded self-insurance pool of over 80 school districts in Washington State and we are one of the pools subject to this regulation.

We support the proposed revisions to WAC 200-100, particularly decreasing the time to eight months for audited financial statements to be submitted to the State Risk Manager, and the increase to 80% confidence level by an independent actuary measuring year-end solvency for each pool.

Both are critical to ensuring the fiscal safety and soundness of self-insured pools in this State. The stakes are too high to compromise on these issues, particularly when both will provide the State Risk Manager a degree of advance notice when a pool is in financial trouble, and allow time to take proactive steps to make a difference.

Sincerely,



David Hayasaka  
Executive Director