



September 6, 2013



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RE: Chapter 200-100 WAC
Self-Insurance requirements governing local government and non-profit self-insurance

Washington Cities Insurance Authority is a jointly funded, self-insurance pool of over 160 cities, towns and special districts within Washington State, and we are subject to this regulation.

We support the proposed revision 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 percent 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 the 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 ins financial trouble, and allow time to take proactive steps to make a difference.

Sincerely,

A handwritten signature in black ink that reads "Ann Bennett".

Ann Bennett
Interim Executive Director