

## **Insurance Commissioner**

*Consumer protection is the most important job of the Insurance Commissioner.*

When the office was created by the first state Legislature in 1889-90, its main function was simply to register insurance companies that wanted to do business in Washington. Today, the role has expanded to include overall industry regulation, making sure companies meet all their obligations and abide by the rigorous financial and legal standards set for doing business in this state.

About 50 of the 1,500 authorized insurers in Washington State today are domestic insurers, which means they have their headquarters in the state. In addition, the agency is responsible for the testing, licensing and oversight of more than 36,000 individual companies and licenses each year.

Any citizen may file a complaint with the Insurance Commissioner and request an investigation of that complaint. The Consumer Protection Division routinely fields more than 200,000 contacts a year, many of them via a special toll-free hot line: 1-800-562-6900.

Seniors on Medicare or other retirement benefits have access to a special arm of the agency. The Senior Health Insurance Benefits Advisors are trained by the experts on the Commissioner's staff and are available in most Washington communities to meet with other seniors to discuss health-insurance concerns.

The Commissioner's office collects a special tax levied on insurance companies and turns over more than \$100 million a year to the state's general fund. The insurance industry also must pay for its own regulation. Companies share that cost according to the amount of business they do in the state.

# Washington Citizens' Commission on Salaries for Elected Officials

## Official Position Description Form for Executive Branch Positions

July 1, 2022

Name: Mike Kreidler

Position Title: Insurance Commissioner

**1. Position Objective: Briefly describe the overall purpose of this position and what is intended to be accomplished through your effort(s). This section should be broadly focused and summarized in two to four sentences.**

Washington's insurance market is the 35<sup>th</sup> largest in the world, and insurance is the eighth-largest industry in the state, with \$55 billion in annual premiums. The Insurance Commissioner protects consumers through fair and effective regulation of the insurance business in Washington and affects the biennial collection of over \$1.4 billion in insurance premium tax. He promotes a stable, competitive insurance market through policy and regulation and develops and implements national and international standards in cooperation with state, federal, and international governments. The Commissioner's regulatory authority is granted by state law (Title 48, Revised Code of Washington) and through delegated enforcement of federal laws.

**2. Financial Dimensions:**

**a. Number of employees in your organization:** The Office of Insurance Commissioner (OIC) authorized 272.0 FTEs for the 2021-2023 biennium. The Commissioner also administers the Statewide Health Insurance Benefits Advisors (SHIBA) program, which delivers services through a statewide network of more than 180 trained and certified volunteers.

**b. Your annual budget:** \$79 million for the 2021-2023 biennium

**c. Other annualized dollar amounts your job controls or influences: (biennium amounts)**

Revenue Collected (based on 2021-2023 budget submittal):	
<i>General Fund</i>	
Insurance Premium Tax	\$ 1,373,377,000
Penalties	\$ 8,200,000
Insurance Licenses and Fees	\$ 35,000,000
<b>Total General Fund Revenue</b>	<b>\$ 1,416,577,000</b>
<i>Insurance Commissioner's Regulatory Account</i>	
Regulatory Surcharge	\$ 67,541,000
<i>Insurance Commissioner's Fraud Account</i>	
Insurance Fraud Surcharge	\$ 3,618,000
<i>Health Benefit Exchange Account</i>	
Insurance Premium Tax	\$ 55,914,000
<b>Total Biennium Revenue</b>	<b>\$ 1,543,650,000</b>

**3. Principal Responsibilities:**

List in a series of brief factual statements\*, starting with the most important, the accountabilities of your position. Each statement should be a complete sentence describing a single basic result your job is expected to accomplish. Typically, eight to 10 responsibilities are listed, but there is no limit.

**a. As the OIC's chief executive, the Insurance Commissioner is accountable for the following consumer protection and regulatory activities:**

- Authorizing insurance companies to conduct business in Washington. Ensures companies must meet capital and regulatory requirements.
- Actively monitoring insurance company financial viability and market conduct thorough examinations and analysis – preventing insolvency and providing continued access to affordable insurance benefits.
- Detecting and stopping illegal business practices that harm consumers directly or through damages to the market, affecting the affordability or availability of insurance or other risks.
- Managing the daily operations of insurers in receivership. The Commissioner has fully rehabilitated four of the six companies placed in court-ordered receivership. Two were fully liquidated. The Commissioner has also resolved significant financial distress in at least six other companies without resorting to court-ordered receivership or liquidation.
- Licensing and monitoring insurance producers, adjusters, and surplus lines brokers and responding to allegations of misconduct by any of these licensees when they occur.
- Reviewing and approving insurance policy contract (form) language and rates (premium) to ensure compliance with state and federal laws and those rates are not excessive, inadequate, or unfairly discriminatory.
- Reviewing and approving contracts between insurance companies and health care providers (provider contracts) for compliance with state laws.
- Requiring that insurance companies offering health plans provide access to health care providers (network adequacy) for all covered services, especially in rural areas.
- Working with consumers to provide information and resolve complaints against insurance companies, which includes operating a consumer hotline and various outreach activities.
- Protecting consumers from balance or “surprise billing” and discrimination based upon their health status, gender identity, race, ethnicity, or disability.
- Providing free, unbiased, in-depth, one-on-one insurance counseling and assistance to Medicare beneficiaries, their families, friends, and caregivers.
- Educating consumers to detect and report Medicare fraud, errors, and abuse through outreach, counseling, and individual education.
- Investigating alleged violations of the insurance code and bringing enforcement actions against entities and individuals found to be violating the insurance code, including levying fines, penalties, and cease-and-desist orders when insurance companies or insurance producers violate the law, as well as imposing compliance plans where necessary.
- Investigating allegations of criminal insurance fraud, preparing, and forwarding cases for prosecution.
- Collecting revenue, including insurance premium taxes, regulatory and insurance fraud surcharges, fees, and penalties.
- Coordinating efforts with local insurance guaranty associations and national associations to ensure the payment of claims of liquidated insurers to Washington residents.
- Develop and promulgate administrative rules that govern regulated entities.
- Developing state and national policies and laws and advising the Washington state Congressional delegation and Washington state legislators on such matters.

- Actively participating in the National Association of Insurance Commissioners (NAIC), a body dedicated to developing national and international regulatory standards, national policy, and model laws.
- Adjudicating claims by small pharmacies against pharmacy benefit managers over the reasonableness of reimbursement of multi-source generic drugs.
- Responding to and regulating new entities developed in the insurance market, such as insurance technology companies, captive insurers, and health care benefits managers.

**b. Summary of the Insurance Commissioner's consumer protection, regulatory, and enforcement activities from July 1, 2020, through June 30, 2021**

- 2,561 insurance companies, charitable gift annuity issuers, health care service contractors, health maintenance organizations, self-funded multiple employer welfare arrangements, health care discount plans, fraternal benefit societies, purchasing groups, risk retention groups, service contract providers, life settlement providers, accredited, certified and trusted alien reinsurers, reinsurance intermediaries, guaranteed asset protection waiver providers, direct practice providers, health care benefits managers, independent review organizations, captive insurers, and mandated insurance associations authorized or regulated.
- 217 market analysis reviews of domestic and foreign insurers completed, resulting in the opening of 72 market conduct continuum actions, 62 of which were closed, 37 with enforcement referrals. There were 13 enforcement actions with consent orders for lapsed producer appointments and no enforcement actions with consent orders for late Market Conduct Annual Statement (MCAS) filings.
- 236,715 insurance producers, adjusters, and surplus line brokers licensed, of which about 80 percent are non-resident.
- Consumer Inquiries received and answered.
  - 67,537 consumers called the Insurance Consumer Hotline and received help.
  - 6,296 consumers filed complaints against insurance companies.
  - 6,352 consumers submitted electronic inquiries about insurance issues.
  - 7,253 consumers received answers through the agency's live chat service.
- Over 59.4 million recovered for consumers wrongfully denied claims or charged incorrect premiums.
- Free Medicare counseling provided to over 108,507 Medicare beneficiaries, caregivers, and family members - education to prevent, detect, and report Medicare insurance fraud, errors, and abuse.
- 170 consumer Medicare complaints submitted to the U.S. Department of Health and Human Services, Center for Medicare, and Medicaid Services (CMS).
- 5,301 referrals from the National Insurance Crime Bureau, NAIC, insurance companies, and Washington residents reporting possible criminal insurance fraud triaged, indexed, and researched in the 2019-2021 biennium.
- 196 criminal fraud investigations opened and 69 for prosecution in the 2019-2021 biennium
- Over \$6,305,329 in restitution and loss prevention from criminal fraud cases was collected in the 2019-2021 biennium.

- 171 and 120 investigations into alleged violations of the insurance code were completed in 2020 and 2021, respectively.
- 669 and 550 enforcement actions were initiated in 2020 and 2021, respectively, against companies for violating the insurance code.

#### **4. Knowledge and Skills**

##### **a. Education and Experience**

The Insurance Commissioner impacts every resident and business in our state and has far-reaching influence at the national and international levels. The Commissioner's duties require a combination of professional education and leadership experience and a demonstrated ability to provide vision and leadership and make decisions in substantive areas of public policy. The position also requires experience in successfully managing complex organizations in public and private sectors, operating effectively in the political arena, and interacting with a broad range of constituencies.

##### **b. Specialized (job content) knowledge and skills**

- Strong executive leadership skills to assess and balance competing needs of dynamic changes to the insurance market, financial solvency, and consumer protection.
- Demonstrated knowledge of corporate governance standards and practices to carry out the role of financial and marketplace regulator.
- Political and public policy acumen to successfully formulate, influence, and advance insurance regulatory issues at the state, national, and international levels.
- Adeptness in balancing the issues and demands of a wide range of interest groups, including the insurance, securities, and banking industries, state and federal regulators, consumers, health care providers, legislators, other state agencies, the federal government, and the media.
- Demonstrated knowledge of the interconnections of multiple forms of insurance entities, including intermediate entities, and their products with the general economy.

##### **Proven ability to:**

- Serve as the primary insurance consumer advocate for Washington state residents and businesses by providing assistance, information, and education on insurance issues.
- Serve as the insurance industry regulator, emphasizing the values of consistency and fairness to foster a truly competitive industry environment.
- Partner with consumer advocacy groups and the insurance industry to recognize, anticipate, and adapt to unpredictable markets and maintain a viable, sustainable insurance environment.
- Determine when a company's weak financial condition requires intervention (i.e., oversight, receivership, sale, or liquidation) necessary to protect policyholders and taxpayers.
- Determine when an insurer's market activities impacting consumers and the general public require regulatory intervention.
- Manage the operations of an insurance company in receivership.

- Use various methods required or permitted by law and consistent with sound public policy to secure from regulated entities (i.e., insurance and risk assumption providers, producers, and licensees) good faith operations and regulatory and statutory compliance.
- Develop consensus on contentious issues.
- Set priorities and align resources, efforts, and services with agency vision and strategy.

## 5. Nature and Scope

### a. Organization (organization chart enclosed)

- **Size and role of this position and its importance to the state's mission and reputation. Diversity of job scope/responsibilities.**
- Washington state has the 35<sup>th</sup>-largest insurance market in the world and the 17<sup>th</sup>-largest in the U.S. This complex and increasingly diverse insurance industry is critical to Washington's economy and the well-being of state residents. The insurance industry in Washington generated \$47 billion in premiums in 2018, employed 57,263 people in the state, and accounted for \$4.5 billion in compensation. As of 2016, the most recent data available, the industry contributed \$6.8 billion to Washington's gross state product, about 1.53 percent of the state's total. Insurance companies pay tax based on premium volume written, which funds a wide range of state services by contributing to the state's General Fund. Without appropriate, affordable personal and commercial insurance products, commerce in Washington state would cease, and individuals would be exposed to various financial perils.
- Washington's insurance industry is critical to national and global economies as well. Domestic insurers generate approximately \$17 billion of premiums annually in the state and another \$6 billion in other states. Washington consumers annually pay about \$24 billion in insurance premiums to foreign insurers, contributing to the state, national and global economies through the purchase of reinsurance and by providing reinsurance on policies sold in other jurisdictions.
- The Commissioner's responsibilities range from consumer advocacy to monitoring the financial solvency of multi-billion-dollar companies. Preventing the financial failure of insurers is essential to the OIC's consumer protection mission. Other critical responsibilities include denying excessive insurance rate increases or insufficient rating plans, maintaining access to health care services through a health insurance plan, investigating insurance fraud, monitoring the professional conduct of insurers and licensees, and penalizing violators of the law.

### b. Management environment

- **Key challenges, sensitivities, risks, etc., inherent in the position and political environment.**

#### Innovation and Technology

New technology and innovative business models are transforming the insurance landscape. Consumers are interested in obtaining insurance that is both affordable and meets the needs of their families and businesses. The insurance industry is increasingly leveraging technology to transform how they interact with consumers and deliver streamlined services based on user preferences. The National Association of Insurance Commissioner's Center for Insurance Policy and Research has identified that big data, the Internet of Things, artificial intelligence, blockchain, mobile technologies, and wearable devices are transforming what consumers expect from insurance products and services. These technologies also pose challenges to insurance regulators – to protect consumers from cybersecurity risks and potential negative consequences of bias embedded in algorithms based on historical patterns of inequality. New insurance

products and services arising from these technology trends often require that the consumer provide personal data, such as health and location, in return for access. The Commissioner and OIC staff are working at the national level to design and implement regulatory protections around these services to retain competition and consumer protections within these markets.

#### Flood Insurance

Damage due to rising flood waters has long been held an uninsurable event by private insurance companies. The federal government established the National Flood Insurance Program (NFIP) in 1968 as a response to the lack of available flood insurance and to increasing federal disaster assistance due to flood peril. The NFIP partners with private property and casualty insurance companies that administer national flood insurance policies. The federal government underwrites the cost of the program. Historically, the federal flood premium rates did not accurately reflect the risk associated with the covered properties. This has resulted in catastrophic losses, now NFIP debt, ultimately paid for by U.S. taxpayers.

The NAIC and state insurance regulators support a long-term reauthorization of the NFIP to take steps to reduce the complexity of the program and strengthen the NFIP's financial framework so that the program can continue helping individuals and communities secure flood insurance. Currently, the NFIP is authorized through September 30, 2022.

The NAIC's NFIP reauthorization recommendations for Congress include encouraging more significant growth in the private flood insurance market. Congress faces the challenge of maintaining a balance between improving the program's financial solvency and reducing taxpayer exposure while also being mindful of affordability concerns.

The rise of private flood insurance products by insurance companies that were traditionally considered uninsurable is changing in this market space. With the rise of sophisticated data modeling and the use of artificial intelligence, insurance companies are getting more comfortable finding the ability to price back into this market and sell flood insurance to consumers.

#### Ongoing Health Care Reform

The passage of the federal Affordable Care Act (ACA) in 2010 set the most comprehensive effort ever to reform the U.S. health care system. The Commissioner's involvement from the start has been crucial to the successful implementation of the ACA in Washington state. Early reforms that have been successfully safeguarded include eliminating lifetime caps, allowing young adults up to age 26 to stay on their parents' health plans, requiring coverage regardless of pre-existing conditions, providing prescription drug cost savings to seniors, and eliminating out-of-pocket costs for preventive care.

Changes of this magnitude to insurance markets have required the Commissioner to communicate complex and sometimes unwelcome information to understand the challenges health insurers face in implementing changes and to ensure that the OIC is well prepared to do its part and withstand the pressure from insurers when they disagree with decisions.

Federal health care reform issues and challenges continue, even with the successful implementation of the Affordable Care Act. The Commissioner supports coordinated responses at the national level through involvement in the work of the NAIC, development of statewide initiatives, such as alignment of Washington state's Balance Billing Protection Act with the federal No Surprises Act, and adoption of over ten sets of rules to imbed ACA and behavioral health parity protections into state law. He has also taken action to limit the sale of short-term limited, duration medical plans that lack core consumer protections required in ACA coverage.

#### Regulating the health insurance market inside and outside of the Health Benefit Exchange (HBE)

In 2011, the Washington State Legislature established a state-run online insurance marketplace under the ACA known as the Washington Health Benefit Exchange. It authorized the Governor and Insurance Commissioner to facilitate implementation. Subsequently, in 2012, the Legislature adopted E2SHB 2319, which guided market stabilization and clarity on roles and responsibilities and provided the Commissioner with significantly more responsibility and authority.

Implementation of the ACA in Washington continues, with an increase in the number of health insurers offering health plans in the individual market and choice of health plans in all of Washington state's counties. As the most senior insurance regulator in the nation and a proven leader in health care reform, the Commissioner continues to devote time, energy, and resources to maintaining stability in these markets. This includes testifying before Congress as an invited expert, supporting legal action by the Washington State Attorney General, and actively engaging fellow insurance regulators on critical concerns. Work to maintain stable health insurance markets and protect consumers are anticipated to continue, with or without further action by the federal government.

#### Fostering Access to Affordable Health Care

Access to affordable health care remains a top priority for the Commissioner. Most Washingtonians, access to health care is based on the ability to pay. The cost of health insurance continues to be a challenge nationally and in our state. With the implementation of the ACA, Washingtonians' access to health insurance increased exponentially. However, the cost of health insurance remains an issue even for those with coverage, as consumers cope with high deductibles and out-of-pocket costs. As the ACA expanded, more people joined the health care system. The uninsured rate for Washington state increased from 6.2 percent in 2018 to 6.6 percent in 2019 and 6.7 percent at the beginning of 2020. In March, when unemployment claims surged in Washington, the state uninsured rate increased to 8 percent due to the effects of COVID-19. The percentage of people without health insurance in Washington state increased in 2018 for the first time since 2014. Due in significant part to enhanced premium subsidies available through the American Rescue Plan Act, the uninsured rate in Washington state as of June 2021 had fallen to 5.2%. The Commissioner is actively working with Congress, the Legislature, and the HBE to continue these federal subsidies beyond their current December 31, 2022, expiration date.

In 2019, the Washington Legislature adopted Engrossed Substitute Senate Bill 5526, also known as Cascade Care. It includes creating standardized plans, designed by the HBE in consultation with the Commissioner, and the nation's first public option plans, procured by the Washington State Health Care Authority (HCA) and subject to approval as health plans by the Commissioner.

The Commissioner has also prioritized holding health insurers accountable for maintaining adequate access to health care provider networks. This effort is particularly challenging in rural Washington, where a lack of general practitioners and specialists persists.

#### Ending "surprise billing" in Washington state

In 2019, the Commissioner and the Legislature enacted comprehensive legislation to protect consumers from receiving surprise or balance bills from health care providers outside their health plan's network when consumers have little control over which provider cares for them. Washington's Balance Billing Protection Act (BBPA) is one of fewer than 20 state laws recognized as comprehensive in their scope of consumer protections. It has been the model for other states' surprise billing statutes. The law carefully balances the interests of health insurers and providers while removing consumers from the middle of such disputes.



As of January 1, 2020, consumers who need emergency care and seek care at in-network hospitals and surgical facilities but receive care from providers who are not in their health plan networks were no longer balance billed. The Commissioner adopted rules to solidify the consumer protections in the newly passed law. In addition, while the Commissioner does not generally have the authority to regulate self-funded group health plans, Washington's law allows these plans to "opt-in" to balance billing protections for their employees.

Only three states have this option in their laws. Over 380 self-funded group health plans, representing over 500,000 consumers, have chosen to opt-in.

In December 2020, Congress enacted the No Surprises Act, establishing balance billing protections under federal law. That law went into effect on January 1, 2022. Given the state and federal laws regulating the same conduct, the Commissioner proposed, and the Legislature enacted a new law during the 2022 legislative session to align state and federal balance billing law while preserving critical consumer protections adopted in the Balance Billing Protection Act. Washington is the first state in the nation to enact such legislation. The new law also expands health insurance coverage of mental health and substance use disorder crisis services when the COVID pandemic has laid bare the critical need for increased access to these services.

#### Assessing Potential Effects of National Disasters

The Commissioner has long been concerned about the potential devastation to the state from natural disasters. In 2017, he directed a survey of insurers in Washington state to assess how many properties are covered by earthquake insurance. In the 2018 legislative session, the Commissioner proposed legislation to allow insurers to assist their insureds with risk mitigation goods or services, such as water monitors to prevent flooding, foundation strapping, and brush clearing to mitigate losses due to wildfires. He also requested legislation to study risk mitigation and the state's ability to bounce back from natural disasters.

#### Responding to the COVID-19 Emergency

The COVID-19 pandemic presented unprecedented challenges to Washington state, its people, and its economy. As soon as the Governor declared a public health emergency on February 29, 2020, the Commissioner determined appropriate measures needed to protect consumers within his emergency authority granted under Washington state law in RCW 48.02.060.

With respect to protecting consumers' access to care, on March 5, March 24, and April 3, the Commissioner issued emergency orders that, among other actions, directed health insurers to:

- Greatly expand the use of telehealth services
- Provide COVID-19 testing and related provider visits with no cost-sharing
- Allow consumers to receive early refills of their prescriptions to ensure they have an adequate supply of medications
- Lift any prior authorization requirements that could impede or delay access to COVID-19 testing and treatment
- Extend grace periods to allow employers more time to pay their health insurance premiums.

On March 25, Governor Inslee issued Emergency Proclamation 20-29, mandating telemedicine payment parity, in response to the Commissioner's request.

In June 2021, as the state undertook a significant effort to provide access to new COVID vaccines, the Commissioner issued an emergency order requiring health insurers to pay providers to counsel their patients regarding the benefits and risks of COVID vaccines.

Concerning property and casualty insurance coverage, on March 25 and April 27, the Commissioner issued emergency orders that, among other actions, directed health insurers to:

- Provide grace periods for nonpayment of premiums and waive all charges associated with the nonpayment of premiums, such as late fees and reinstatement fees
- Not cancel a policy for nonpayment of premiums unless directed to by the insured
- Provide an extension for policyholders to report completed repairs to claim withheld depreciation payments

On April 20 and April 27, the Commissioner also issued emergency rules to help producers as follows:

- Enabled online courses and extensions related to producer licensing educational requirements because of the impact of the Governor's stay-at-home order.
- Extended the amount of time producers had to renew and pay their required renewal fees.

#### Surplus Lines Insurance

With the passage of the Non-Admitted and Reinsurance Reform Act of 2010, the challenge has been to change surplus lines insurance regulation without reducing consumer protections, unduly burdening the insurance market, or causing significant loss of tax revenue to the state. The Commissioner continues to work with the admitted and non-admitted industry, and the NAIC, to seek solutions at the state and national levels, to modernize surplus lines regulation without reducing consumer protections, unduly burdening the insurance market, or causing significant loss of tax revenue to the state. As part of the modernization effort, the OIC is involved with the NAIC to revise and update Model 870 – the Non-Admitted Insurance Act, which will include future legislation.

OIC staff continue to work with the Surplus Lines Association of Washington to develop a system for the electronic filing of required reports, which provides data helpful in analyzing the extent of this insurance market in the state.

#### • **Other unique regulatory challenges and responsibilities**

##### Washington's Insurance Market

The tight health insurance market is ripe for scam artists. Illegal health insurance plans are surfacing around the country, preying on vulnerable people struggling to find adequate and affordable health care. Early education to alert consumers to phony insurance plans is vital, as is early detection and prosecution.

Increased use of the Internet to sell insurance also creates regulatory challenges. An increasing number of insurance transactions are occurring online without advice from insurance producers, and consumers are finding themselves in need of help and information from the OIC.

Insurers offering life and annuity policies will continue to press for a national review system for rate-and-form filings. Washington is one of 46 states in the Interstate Insurance Product Regulation Compact (IIPRC). IIPRC-approved products generate over 75 percent of the national life and annuity premium volume. The Commissioner is an active participant and directly impacts the approval of products sold in all 46 compact states. The IIPRC promotes uniformity through the application of national product standards embedded with strong consumer protections that are the hallmark of our state-based regulatory system.

The Commissioner's leadership role addresses unanticipated issues that affect insurance markets. He has been a leader in addressing discrimination in health care insurance by scrutinizing insurers' pharmaceutical formularies to ensure that they do not use them as a discrete method of preventing enrollment. He continues to be a robust and effective advocate to end discrimination, and treatments for medical service coverage and behavioral health (mental health and substance use disorder) benefits through rulemaking and strong oversight of health insurers' practices. Historically, this different treatment for medical services versus behavioral health services has left consumers with gaps in access to care, significantly higher costs for needed mental health and substance use disorder treatment, and difficulties obtaining access to these needed services. Since 2018, the Commissioner has engaged in active oversight of health insurers' compliance with state and federal mental health parity laws.

The Commissioner has a national leadership role in addressing health care provider network access standards. Arising in part from the implementation of the ACA, health insurers are creating narrower provider networks to reduce costs. Through Commissioner Kreidler's leadership, Washington became the first state in the nation to issue rules setting minimum standards for maintaining provider network access and adequacy under the ACA.

The Commissioner has proposed legislation to help provide stability and ensure that 248,000 people can maintain health insurance coverage in Washington's market. In 2018, his proposed legislation to create a state reinsurance program would have lowered individual market health plan premiums increases by up to 10 percent and encouraged greater insurance company participation and more health plan options in the 2019 individual market. The Commissioner's proposal remains an option for future years should the need arise for additional measures to provide stability to the individual health insurance market. In 2020, he continued his advocacy to establish a federal reinsurance program to address affordability and market stability.

#### National Uniformity

The Commissioner continues to take steps to modernize Washington's producer (insurance agent and broker) licensing laws to meet national uniformity and reciprocity standards. The OIC accepts resident and non-resident producer and surplus line broker licensing and renewal applications through the National Insurance Producer Registry (NIPR) Gateway, a communication network that improves the efficiency and effectiveness of the state licensing process through automation, standardization, and reciprocity.

#### Big Data and Price Optimization

The increasing use of "big data" by property and casualty insurers requires that the Commissioner remain vigilant in protecting consumers from discrimination. Using new, non-traditional databases can result in insurance rates based on factors other than risk. For example, using a technique known as price optimization, insurers could determine premiums based partly on the likelihood of whether consumers will, when faced with a rate increase, shop around for insurance. The Commissioner refers to this practice as a "loyalty penalty" – consumers loyal to their insurance company and unlikely to shop around could be charged a higher premium. He disallowed the practice in 2015. Big data also presents the opportunity for regulators to analyze the filings and activities of insurers more efficiently and effectively in the Washington market.

#### Leveraging Big Data

The Commissioner is leveraging big data for a behavioral health grant project to determine mental health parity in Washington state. This has been facilitated by participating in the state's all-payer claims database. The Commissioner also constantly monitoring all the health insurance markets by requiring insurers to submit data in the individual, small- or large-group markets. Any fluctuations in curves like

enrollment, price trend, and network adequacy are immediately noted and reported. This is possible only through leveraging big data on regularly.

The Commissioner is working on a partnership with the Health Care Authority and the Washington State Employment Security Department to leverage big data in developing accurate, precise, and real-time health insurance enrollment data statewide. This will shed light on the uninsured population demographics. This partnership will allow the Commissioner to monitor and watch trends in different medical insurance markets, such as the flow of individuals from one market to another due to external economic changes. He is also planning to leverage big data to examine automobile insurance trends in Washington.

The collection of big data on various topics like insulin, direct practice, network adequacy, and title insurance has allowed the Commissioner to provide important information to legislators as they evaluate bills on these topics. This year, the Commissioner will be collecting additional data in a study to understand Washington's captive insurance market landscape, which could potentially bring in a significant amount of revenue to the state.

#### Health Care Sharing Ministries

The Commissioner has seen a proliferation of health care sharing ministries (HCSM) operating in Washington. HCSMs are not health insurance. They are a form of health coverage not subject to the consumer protections of the ACA. HCSMs are members who pledge to follow a standard set of religious or ethical beliefs and contribute – typically monthly – a payment to help cover the qualifying medical expenses of other members. An HCSM will then either match paying members with those with health care cost needs or pool all the monthly shares and administer payments to members directly. The Commissioner is a leader in the nation ensuring, that all sharing ministries in Washington are acting lawfully, with full transparency regarding their function and obligations to members.

#### ERISA Health and Welfare Plans

The Commissioner has seen many of health and welfare plans promoted as ERISA-approved plans in Washington. The Employee Retirement Income Security Act (ERISA) of 1974, the federal law, regulates employee welfare benefit plans and, in some cases, exempts such plans from state insurance regulation. However, determining when a plan is exempt and subject to state insurance regulation is complex. The Commissioner initiates investigations to determine if the plans comply with state and/or federal law to protect consumers from fraudulent plans. When necessary, the Commissioner brings enforcement actions against entities violating the state insurance code.

#### Medical Malpractice Liability

As part of comprehensive health care liability reform that began in 2006, the Commissioner submitted a twelfth medical malpractice annual report in October 2021. Chapter 48.140 RCW established reporting requirements for medical malpractice claims that have been filed, resolved, and closed to gather meaningful data to support policy decisions. The report includes information identifying trends and provides insight into the overall economic impacts of medical malpractice costs. Medical professional liability insurance has historically been a profitable line of business for insurers in Washington, but profits have declined in recent years. In 2021, Washington's largest insurer of physicians increased their rates for the first time in more than a decade, followed by another rate increase in 2022.

#### Fighting Criminal Fraud

The Commissioner's Criminal Investigations Unit (CIU) identifies, investigates, and prosecutes criminal insurance fraud, estimated by the National Insurance Crime Bureau to cost each household as much as

\$700 a year. The CIU works with state and local law enforcement, prosecutors, FBI and federal law enforcement, and other state insurance commissioners.

Major recent cases:

- A fraudster entered a guilty plea and was sentenced in federal district court to 2 years in prison for submitting exaggerated claims to numerous insurance companies for medical equipment she sold from her medical supply business. She altered and fictitious invoices were submitted in support of the claims for several hundred thousand dollars.
- A surplus insurance broker arranged numerous policies for businesses operating in high-risk industries, then collected total premium payments. Instead of forwarding the premium payments to the insurance company, she obtained premium financing on behalf of her clients without their knowledge or consent. She then defaulted on the financing agreements, often resulting in the cancellation of the client's policy without the client's knowledge. She used the fraudulently obtained funds to pay personal expenses. She was convicted in US District Court, ordered to pay \$273,137 in restitution, and sentenced to federal prison.
- A suspect was involved in a collision with a semi-truck disabled on the shoulder of I-405 in King County. After the crash, the suspect obtained an insurance policy, then filed a claim for \$23,661, falsifying the date and time of the collision representing the collision occurred within the policy period when in fact, she was not insured at the time of the crash. She entered a guilty plea and was sentenced to probation in King County Superior Court.
- **Key Partners - Regulatory and health care reform partners**

National Association of Insurance Commissioners (NAIC)

The NAIC is comprised of the chief insurance regulators of the 50 states, several U.S. territories, and the District of Columbia. Insurance regulators work together to address common issues. The NAIC represents state insurance regulators' interests to the insurance industry, consumer groups, and Congress. To protect insurance consumers and improve efficiency, the Commissioner and his staff work closely with other states to develop common approaches to insurance regulation, including model laws and uniform procedures.

The NAIC's role in implementing federal health care reform. The Commissioner is a member of the NAIC Health and Managed Care Committee, which has specific implementation responsibilities with national implications under the ACA, and the Property and Casualty Insurance Committee, which monitors and responds to problems associated with products, delivery, and cost in the property/casualty insurance markets. As the country's longest-serving commissioner, Commissioner Kreidler has assumed a leadership role in working with Congress and the U.S. Department of Health and Human Services on behalf of the NAIC. The Commissioner and his staff actively participate in many NAIC committees, task forces, working groups, and subgroups to establish actuarial standards, provide climate change oversight, and develop market conduct analysis and standards (to inform our risk surveillance, market conduct inquiries, and financial condition analyses and exams), an accreditation program to raise financial risk surveillance standards (including model laws, regulations, handbooks, instructions, and training), an own-risk solvency assessment program, risk-focused examinations, company licensing and holding company oversight.

Washington State Legislature

The Commissioner coordinates with members of the Legislature to ensure legislation continues to have strong consumer protections codified in state law across all lines of insurance. The Commissioner provides

technical assistance and offers expertise and information for consideration on insurance matters brought before legislators. This includes developing and presenting agency request legislation for consideration to the legislature, including model legislation needed to maintain the OIC's accreditation with the NAIC, and technical review of others' legislative proposals.

#### International Association of Insurance Supervisors (IAIS)

The IAIS represents insurance regulators and supervisors of over 200 jurisdictions in nearly 140 countries, constituting 97 percent of the world's insurance premiums. It also has more than 130 observers. IAIS's objectives are to promote effective and globally consistent supervision of the insurance industry and to develop fair, safe, and stable insurance markets for the benefit and protection of policyholders. As a co-signer on the IAIS Multilateral Memorandum of Understanding, the OIC reviews other states and countries for consistent reciprocal regulation. The Commissioner also impacts the international marketplace through participation in NAIC committees focused on converging financial solvency requirements in the U.S. and other countries. This includes developing and adopting model acts on holding companies, own-risk and solvency assessment, credit for reinsurance, and corporate governance. The Commissioner and other members of the Sustainable Insurance Forum approved a paper (that OIC staff helped draft) for the IAIS to guide regulators on how they should engage insurers they regulate regarding climate change.

#### Partnership with United Nations on Climate Change

The Commissioner has partnered with the United Nations on climate change, disaster, and climate resiliency in the insurance industry. Efforts include signing on as a supporting institution to the UN Environment Program Finance Initiative and the UNEP FI Principles for Sustainable Insurance Initiative. Both serve as a global framework for the insurance industry to address environmental, social, and governance risks and opportunities. It is the largest collaborative initiative between the UN and the insurance industry. An outgrowth of the UN climate change activities was forming an international group of concerned insurance regulators called the Sustainable Insurance Forum (SIF), which promotes supervisory and regulatory leadership on sustainability challenges and opportunities in the insurance sector. The Commissioner is actively pursuing SIF's agenda to have more insurers report using the guidelines created by the Task Force for Climate-Related Financial Disclosures (TCFD). Together with California, the Commissioner has represented the United States in the SIF since its inception. The NAIC and others, including the U.S. Department of Treasury's Federal Insurance Office and several other states, have joined the SIF recently.

#### U.S. Department of Health and Human Services (HHS)

HHS is the lead federal agency for implementing health care reform. The OIC has worked closely with HHS and the NAIC to identify issues, develop processes, and answer numerous complex questions to implement ACA reforms.

#### Washington Health Benefit Exchange

One of the Commissioner's highest priorities is to support the Washington Health Benefit Exchange's continuing operations and role as a marketplace for Washingtonians to purchase individual health insurance and enroll in Apple Health coverage. The Commissioner serves as a non-voting member on the Exchange Board and is responsible for reviewing and approving health insurance plans the Exchange offers. The Commissioner also exercises regulatory authority over private health care plans not sold on the Exchange.

Under the Commissioner's leadership, the Exchange marketplace has become one of the more robust in the nation. The Commissioner approved 120 individual health plans on the Exchange in 2022. The number of insurers (15 in the Exchange and private market) participating in Washington provides many options for consumers and continues the trend of fostering healthy competition.

American Indian Health Commission for Washington (AIHC)

In compliance with the State of Washington Centennial Accord of 1989 and state law, the Commissioner consults and collaborates with the federally recognized Indian Tribal Governments regarding any development and implementation of agency policies that affect them. The Commissioner is an active consultant to the American Indian Health Commission, a tribally driven non-profit organization with a mission of improving health outcomes for American Indians and Alaska Natives through a health policy focus at the state level. The Commissioner is working with the Commission on issues of tribal concern, including services by tribal health care providers under the ACA and improving access to low-income Medicare savings programs for elders and those with disabilities.

Washington State Department of Financial Institutions (DFI)

The Commissioner has established ties with DFI and regularly shares information about investigations and enforcement activities. OIC staff has trained DFI securities staff on annuities and other insurance products and licensing requirements for producers.

Washington State Attorney General's Office (AGO)

OIC staff regularly collaborates with the state Attorney General's staff. The OIC and AGO coordinate fact-finding efforts when allegations concerning violations within the enforcement authority of both agencies are presented. For example, both agencies cooperate in investigating alleged misconduct concerning the sale of living trusts or reverse mortgages where a licensed insurance producer is involved. The Commissioner has also provided technical support for several multi-state cases involving attempts to repeal and replace the ACA.

Washington State Department of Licensing (DOL)

OIC staff regularly shares information with DOL staff about investigations and enforcement activities concerning persons holding bail bond licenses. OIC staff also provides information to DOL's licensed bail bond agents about laws and rules about surety bonds. DOL and OIC staff exchange information about areas of mutual interest, including the regulation of realtors and title insurance.

Community Partners of Statewide Health Insurance Benefits Advisors (SHIBA) Program

The Commissioner's SHIBA program contracts with approximately 20 non-profit organizations throughout the state to serve as local sponsors, providing free, unbiased, educational assistance to help consumers understand their health care rights and options. SHIBA, along with 180 locally based trained and certified volunteers and a network of community partners, provides consumers with timely access to education and assistance. SHIBA contractors and volunteers specialize in providing in-depth one-on-one counseling and assistance to Medicare beneficiaries, families, friends, and caregivers. SHIBA contracts with community-based agencies with a history of reaching out to low-income, minority populations, and limited-English proficiency consumers.

King County Prosecuting Attorney's Office

The Commissioner contracts with the King County Prosecuting Attorney's Office for a dedicated prosecutor and support staff in the Economic Crimes Unit. This allows for focused and expedited charging of complex criminal fraud cases in the most populated area of Washington.

Financial Crimes Enforcement Network (FinCEN)

FinCEN, a division of the U.S. Treasury Department, is authorized to enforce anti-money laundering provisions added to the Bank Secrecy Act by the Patriot Act. NAIC incorporated a joint effort of the NAIC and FinCEN into the NAIC examination processes to support FinCEN's activities. The Commissioner's financial examiners now take on a more significant role concerning domestic insurers to stop money laundering.

Washington State Health Care Authority (HCA)

State law requires the Commissioner to conduct financial examinations of self-insured products offered to public employees and retirees and determine the adequacy of reserves held for these vital health and dental insurance programs (e.g., Uniform Medical Plan). Underfunding reserves could jeopardize the financial viability of the programs and result in additional expenditures by the state to pay incurred claims. The Commissioner's independent financial review and analysis assures ongoing fiscal prudence in the management of the programs and identifies any early indicators of financial distress.

Washington State Department of Health

The COVID-19 pandemic presented historic public health challenges. The Commissioner worked closely with the Department of Health and the Health Care Authority in our battle against COVID-19. As described above, emergency orders issued by the Commissioner were developed in partnership with the Department of Health to enhance the effectiveness of its efforts.

Surplus Lines Association of Washington

The Surplus Lines Association of Washington facilitates compliance of its member brokers with Washington state laws relating to surplus lines insurance transactions and collecting the insurance premium tax. It also serves as the initial recipient of surplus lines certifications that brokers must file with the Commissioner.

Surplus lines insurance is critical even though it represents only 3 percent of Washington's insurance marketplace. When a business or consumer cannot obtain insurance from an admitted or authorized insurer, the business or consumer is permitted to purchase insurance from a non-admitted insurer. However, A licensed surplus lines broker must buy this type of insurance through licensed surplus lines broker.

Washington Health Care Facilities Authority (WHCFA)

The Washington Health Care Facilities Authority is charged with minimizing costs of capital construction and fees to the public for using health care facilities. The Commissioner is a statutory member of the WHCFA Board. By providing tax-exempt interest rate financing for non-profit health care providers in Washington, the authority assisted providers in 2019 in reducing their interest costs by over \$48 million. The savings contribute to modern, well-equipped, and reasonably priced facilities and improved quality of health care in Washington.



Washington State High Risk Pool (WSHIP)

The Commissioner serves as an advisory member of the board of directors for the state's high-risk health insurance pool. Created by the Legislature in 1987, the high-risk pool provides access to Washington residents denied coverage in the individual market because of severe health conditions. WSHIP has an 11-member board of directors, either appointed by the governor or elected by member plans.

Washington Life and Disability Insurance Guaranty Association

The Commissioner serves as a statutory member on the board of directors for this association of all authorized life and disability insurers. The association provides policy benefits to Washington resident policyholders of domestic and foreign liquidated insurers. Those benefits result in credits against premium tax collections resulting in a reduction in funds available for other state government activities. The Commissioner must balance the interests of consumers, insurers, and the state.

Washington Insurance Guaranty Association

The Commissioner is statutorily charged with closely supervising this association of all authorized property and casualty insurers. The association provides policy benefits to Washington resident policyholders of domestic and foreign liquidated insurers. Those benefits result in credits against premium tax collections resulting in a reduction in funds available for other state government activities. The Commissioner must balance the interests of consumers, insurers, and the state.

**c. Problem-solving/decision-making requirements**

The Commissioner faces the exact problem-solving and decision-making requirements as any other chief executive. He must constantly balance regulatory duties with the need to maintain vital services to Washington residents. The Commissioner addresses various complex issues daily, requiring time-sensitive interim and strategic solutions to prevent disruptions to lives and commerce. He often addresses challenges requiring extensive analysis, complex technical information synthesis, and consideration of competing opinions by industry and government experts in a complex political environment. The Commissioner uses his regulatory powers to expand the availability of insurance products through alternative mechanisms and to propose comprehensive legislative solutions to ease market disruptions.

**d. Accountability**

As a statewide elected official, the Commissioner answers directly to the citizens of Washington. His actions and decisions have far-reaching impacts on all residents and insurance-related businesses. The Commissioner is a staunch advocate for consumer protection and a fair and balanced regulator of the state's diverse insurance markets. In recognition of his consumer protection efforts, the Commissioner received the "2009 Excellence in Consumer Advocacy Award" presented by consumer advisors to the NAIC and the "2010 Leadership Award" from the Statewide Poverty Action Network. He was also named the "2012 Public Official of the Year" by the Washington State Association for Justice. In 2014, the Commissioner was invited to the White House to brief the President on the successes and challenges of ACA implementation.

As with virtually all governmental positions, there are precedents, standard practices, and statutory boundaries within which the Commissioner must operate. At the same time, he has considerable leeway when carrying out his duties. As an independently elected official, he has the freedom to actively engage in significant policy initiatives at the state, national and international levels through his membership in the NAIC and direct interactions with members of the state Legislature and Congress. In this way, the Commissioner has a significant role in determining policies, procedures, precedents, and standard practices that have an impact on Washington state, the rest of the nation, and the world.

**e. Planning (Technical and Strategic)**

- **Focus on the requirement for and impact of planning on the state's mission and success of the agency.**

The state's mission is to offer a robust, efficient business environment, and insurance is a crucial component. Regulating the insurance industry requires strategic planning, critical thinking, and tactical accuracy to deliver legally compliant and affordable products to market as efficiently as possible.

Effective planning and execution affect the insurance companies, producers the Commissioner regulates, and Washington consumers are relying on insurance. The Commissioner strives to make continuous improvements and operates the agency in a fiscally prudent manner. To do so effectively and to ensure that the agency achieves its consumer protection mission, it must rely on deliberate, systematic short- and long-term planning.

The OIC uses a performance management system with a comprehensive long-term strategic plan – developed with agency-wide participation – and biennial agency-level business and division-level operational plans. These undergo multiple rigorous reviews to adjust for changing priorities and emerging issues.

The Commissioner is transparent in his work, which is one of the reasons for his success. For example, during the legislative session, he holds two weekly brown bag lunch meetings, one with consumers and stakeholders and another with industry lobbyists and stakeholders. These meetings allow the Commissioner to interact face-to-face with stakeholders about various bills passing through the Legislature and impacting the insurance industry.

In addition to running legislation to improve the insurance market and expand protections for consumers, the Commissioner openly works with stakeholders throughout the year to perfect legislation impacting the insurance market. Additionally, the Commissioner responds to numerous policy and process questions year-round regarding insurance from legislative, congressional, and consumer groups.

**6. Recent changes in this position**

- **What significant changes have occurred in the job since its last review in 2020? Use the format outline to organize your comments.**

Bolstering Access for Consumer Complaints

The Commissioner's Consumer Advocacy Program responds to approximately 7000 annually from individuals encountering difficulties with a variety of insurance-related issues. Consumers submit complaints in writing, using mobile devices, and via an online portal. We also provide telephonic complaint services for individuals requesting reasonable accommodation. In 2016, the program also began a live-chat option for consumers. The program receives over 80 percent of consumer complaints and inquiries electronically.

Additionally, the Commissioner has a formal agreement with the U.S. Department of Health and Human Services, Center for Medicare, and Medicaid Services (CMS) to forward Medicare Advantage and Prescription Drug Plan consumer complaints. Approximately 170 complaints are submitted annually.

Improving Health Care Affordability and Access in Washington State

Protecting and sustaining the success of the ACA continues to be a high priority for the Commissioner, as well as affordability of coverage for individuals, families, and employers purchasing health insurance coverage. The Commissioner's regulatory authority covers rates, forms, and consumer access to medical

provider networks for health insurance sold in the commercial market. In addition to ensuring health insurance company compliance with annually revised federal regulations, the Commissioner established rules governing standards to meet and maintain provider network adequacy. The Commissioner responds to consumer complaints related to health care plans sold through the Exchange and cooperates with the Exchange in their responses.

#### Benefit Manager Regulation

In 2020, the Legislature enacted laws to enable the OIC to regulate all health care benefits managers. Recently, health insurers have begun contracting with health care benefits managers – a relatively new entity in health care insurance – to make a claim and authorization determinations on their behalf.

Examples of health care benefits managers include pharmacy benefit managers, mental health benefits managers, radiology benefit managers, and benefits managers specializing in a wide range of claims and authorization determination. These benefit managers now regularly make healthcare decisions on behalf of insurers, affecting the healthcare services recommended by providers and consumers' healthcare choices.

However, unlike insurers, health care benefits managers were not regulated by any state agency in Washington. While some states regulate pharmacy benefit managers, Washington is a leader in creating regulations for all types of benefits managers, ensuring that all benefits managers comply with Washington's insurance laws.

During the 2020 legislative session, the OIC worked closely with the Legislature and stakeholders to create a comprehensive regulatory program for health care benefits managers that includes registration, oversight, and the filing of all contracts related to the provisions of benefit management services. After the law passed, OIC staff began to create the processes for registering an estimated 500 health care benefits managers over the next few years and for accommodating thousands of new contract filings. The rulemaking was completed in 2020 to facilitate these processes and ensure the successful regulation of benefit managers.

#### Market Conduct Oversight

Assumption of responsibility for independent review organizations (IROs) from the Department of Health which makes the final determination on appeals related to health care claim denials and pharmacy benefit managers, as well as the additional focus on network access, have increased the workload for market oversight staff.

#### NAIC Market Conduct Certification Program

To ensure coordination of market conduct activities, Washington state is working with the NAIC Market Regulation Certification Working Group to develop a Market Conduct Certification Program. The program will include certification standards, processes for state implementation, and the ability to measure state compliance and for future revisions of these standards. Washington is one of a select few states piloting the implementation process.

#### Climate Change

As chair since 2006 of the NAIC's Climate Risk and Resiliency Working Group, until the NAIC formed a Climate Task Force in 2020 and an active member of this task force, the Commissioner is the recognized authority among state regulators for encouraging insurers to manage their exposure to climate risk and speed the path to a low-carbon economy. The Commissioner helped create the NAIC's "Climate Risk

Disclosure Survey, "which for the past dozen years has required larger insurers to report annually on their approach to climate change and how it affects their business. This survey captures over 1,200 company responses. The survey results are available to the public.

The Commissioner is one of the original signatories to the Paris Accord on Climate Change. He is an active participant in the United Nations Environment Program, which assists countries in coordinating environmental activities throughout the world. He is also a founding member of an international group of concerned insurance regulators that has grown out of the Paris Accords called the Sustainable Insurance Forum. The Commissioner is actively pursuing SIF (and IAIS)-endorsed the effort to get more insurers to report using the guidelines created by the Task Force for Climate-Related Financial Disclosures (TCFD).

The Commissioner has worked assiduously to integrate the TCFD, the rapidly emerging global standard for private-sector climate reporting, into the NAIC Climate Risk Disclosure Survey. This effort succeeded when the NAIC adopted changes to the Climate Risk Disclosure Survey to transition to the TCFD guidelines at the 2022 Spring National Meeting.

As of 2022, all insurers required to complete the survey will respond under the TCFD regime.

As a result of the Commissioner's active role on climate change at the NAIC, OIC in 2022 has been invited to participate in two new climate change-related workstreams of the US/EU Insurance Dialog.

This standing exchange between the U.S. and European Union insurance regulators has existed since 2015.

Commissioner Kreidler also continues to host a Climate Summit annually. Recent Summits have featured University of Washington climate scientists, representatives of the Tribes, the Yale Program for Climate Change Communication, a board member of Travelers Insurance (and former state regulator), and Washington-based companies such as Microsoft and Amazon. Recent virtual Summits have enjoyed international viewership of over 2,000.

The Commissioner has expanded his climate work to focus on resiliency and responses to all climate-related perils such as floods and wildfires to other natural disasters such as earthquakes. In 2019, the Commissioner ran agency-request legislation to create a Disaster Resiliency Work Group because he believes it is critical for Washington state to better prepare for disasters and put in place strategies to mitigate the impacts of disasters on Washington citizens. In 2019, the Legislature passed Substitute Senate Bill 5106, making the Commissioner chair of the Washington Disaster Resiliency Workgroup. The work group's directive is to review disaster resiliency activities and make recommendations to the Legislature and Governor on whether the state should create a major disaster resiliency program. The 2021 Climate Commitment Act (SB 5126) included many of the recommendations that came out of the Disaster Resilience Working Group, including the definition of resilience:

"Resilience is the ability to prepare, mitigate and plan for, withstand and recover from, to more successfully adapt to adverse events and changing conditions, and reorganize in an equitable manner that results in a new and better condition."

As the U.S. expert regulator on the regulation of the insurance industry regarding climate change, the Commissioner is often called on to discuss these issues at national and international forums.

#### Surplus Lines Insurance

With the passage of the Non-Admitted and Reinsurance Reform Act (NRRRA) of 2010, the challenge has been to change surplus lines insurance regulation without reducing consumer protections, unduly

burdening the insurance market, or causing a significant loss of tax revenue to the state. The Commissioner continues to work with the admitted and non-admitted industry, as well as the NAIC, to seek solutions at both the state and national levels, to modernize surplus lines regulation without reducing consumer protections, unduly burdening the insurance market, or causing significant loss of tax revenue to the state. The OIC is actively engaged with the NAIC and other states in the modernization of Model 870 – the Non-Admitted Insurance Act.

OIC staff has also worked with the Surplus Lines Association of Washington to develop a system for the electronic filing of required reports, which provides data helpful in analyzing the extent of this insurance market in the state.

#### State Emergency Management

Washington faces many potential natural and technological hazards. The state has had 13 presidentially declared disasters since 2007. Natural disasters impact insurers, residents, and policyholders. The Commissioner will host a Resiliency Summit in November 2018 and October 2019, providing opportunities for experts in several natural disaster fields to share their insight and expertise. The Commissioner plans to host a Climate Summit in October 2020 to further discussions on this topic.

The Commissioner's Emergency Management Manager serves as liaison to the Washington State Department of Emergency Management. The OIC liaison actively participates in planning, mitigation, and response activities for catastrophic disasters such as wildfires, mudslides, floods, earthquakes, and drought. As part of this effort, the Commissioner's staff maintains regular contact with insurers, the Governor's Interagency Continuity of Operations planners, and the State Emergency Operations Center.

The Commissioner maintains a list of frequently asked questions, and agency staff responds to urgent consumer insurance questions regarding winter weather, earthquakes, landslides, volcanos, wildfires, and other natural emergencies. The OIC has also provided on-the-scene assistance to consumers affected by wildfires and landslides.

#### Access to OIC Information and Services

As the face of the agency and its virtual front door, with more than 50,000 unique visitors each month, the OIC website is a critical channel for providing round-the-clock information and services to consumers and industry professionals. Improving website usability and content to adjust to changing technology and higher public expectations is an ongoing agency priority.

Analytics show that the use of mobile devices has doubled in recent years. The projection for future years is that more Americans will access the Internet via mobile devices than personal computers. The Commissioner has adopted mobile-friendly standards for the agency website and has also embraced the use of social media. The agency designated, as a priority, a significant overhaul of its information technology systems in the 2017-19 strategic plan to keep pace with consumer and stakeholder demand. The Commissioner also adopted an electronic and cloud-based messaging distribution system that enables all agency programs to immediately deliver targeted information to select audiences.

The OIC has ten world language landing pages on its website. The agency has also translated a host of critical information for consumers in many world languages to keep in sync with the growing linguistic diversity of our state's population. Most of this translated material is available online and/or through publication mailings. We also offer telephonic interpreter services to communicate with our world language consumers. Our staff offers telephonic complaint intake services for those requesting a

reasonable accommodation. We are always recruiting bilingual staff who can engage directly with consumers in Washington state's most frequently requested world languages.

#### New OIC Technology

The Commissioner continuously extends the OIC's capacity to protect consumers, increase access, and provide services to regulated entities and the public by expanding the capabilities of the agency's technology.

*Consumer complaint and inquiry processing:* Since its launch in 2013, the Commissioner's Online Consumer Complaint Center has been a success, with many of all written inquiries and complaints filed online by consumers. Consumer complaints submitted to the OIC against insurance companies are referred to them electronically. The companies are required to respond to complaints using this secure online portal. OIC, IT staff have worked with agency subject matter experts to enhance our complaint handling through a significant overhaul of our electronic case handling system. This includes efficiency improvements that now automatically set up written inquiries as cases and substantial streamlining to capture telephonic contact logs.

Our Consumer Advocacy and Statewide Health Insurance Benefits programs have fully implemented live chat to handle consumer questions in real-time during business hours. From July 1, 2020, to June 30, 2021, our staff responded to a record-setting 7,253 inquiries from consumers using this feature.

*Better interaction on consumer complaints with the Health Benefit Exchange (HBE):* The Commissioner has successfully built a collaborative relationship with the HBE to respond to consumer complaints that involve Exchange plans. Since the Commissioner does not have regulatory authority over the Exchange, consumers who contacted the OIC with a complaint related to their Exchange plans were initially referred to the Exchange, and the OIC did not necessarily learn of the outcome of the complaints.

Since January 2016, the Commissioner's Consumer Advocacy staff has been able to share Exchange plan-related complaints with the Exchange via a custom-built, secure online portal that all insurance companies use to provide complaint responses to the OIC. Exchange staff uses this portal to receive complaints from the OIC and to deliver outcomes of their work via the portal. This has allowed the Commissioner's staff to see the whole picture and provide a bridge between the consumer, the insurer, and the Exchange. From June 30, 2020, to July 1, 2021, over 60 Exchange-related complaints have been handled via this process.

*Provider network access:* In 2014, the Commissioner made Washington the first state to adopt rules requiring insurers to provide evidence that health plans had adequate medical provider networks. To further support the implementation of the ACA in Washington, the Commissioner enhanced the network access filing process. The new process collects more detailed data for analyzing networks and provides insurers with an automated, secure method to submit required data. The new data collection system began production in March 2017.

*Independent review organizations:* new legislation in 2016 transferred regulatory responsibility of Independent Review Organizations (IROs) from the Washington State Department of Health to the Commissioner, and regulation and oversight began in January 2017. An online portal was created for IROs to register with the OIC and to apply for renewal each year. In addition, the online portal used by companies to request an independent review was upgraded and enhanced to meet the requirements of the 2016 legislation, including the ability for the IROs to receive notification of company requests and the ability for IROs to report the outcome of reviews to the Commissioner.

The Consumer Tools Online Application was also enhanced and continues to provide transparency

of these appeal outcomes to the public via the agency's website. The agency has tracked, monitored, and made outcomes publicly available for 1,470 reviews since January 2017 while ensuring the confidentiality of personally identifiable information of the consumers.

*Balance Billing Protection Act implementation:* The Commissioner's implementation of the Balance Billing Protection Act (BBPA) is built upon a platform of transparency and technology. The self-funded group health opt-in process is managed with a simple online form, and the site includes an evolving listing of participating self-funded group health plans. Individuals and organizations apply to become arbitrators online. The site hosts the list of arbitrators and standardized forms for arbitration requests and reporting, as well as a database of claims information from the state's all-payer claims database to inform arbitrators, insurers, and providers. Consumers can also learn about their rights on the website.

*Technology modernization and continual improvement:* To keep pace with technology and improve the agency's data security, the Commissioner approved an infrastructure modernization project in 2016. OIC put new infrastructure and security technologies in place in late 2017. The Commissioner understands the need to keep technology current and continually improve the agency's business processes. The agency is currently pursuing a modernization effort for the custom enterprise system that includes reviewing and streamlining business processes, upgrading user interfaces, and revamping technology components based on industry end-of-life expectations.

*Continued modernization of insurance licensing:* The commissioner approved a technology project to complete the online insurance licensing database. This project added the remaining license types (rental car agencies, portable electronics, self-service storage, and premium finance companies) to the online portal. These license types were previously available to apply for and renew by paper application. Additional streamlining of manual processes continues to be modernized to online availability

#### Modernization of Insurance Licensing, Producer/Adjuster Laws

The Commissioner continues to bring the state closer to conformity with resident uniformity licensing standards established by the NAIC and reciprocity requirements provided under the federal Gramm-Leach-Bliley Act through active participation in the NAIC Producer Licensing Task Force, which recommends uniformity and reciprocity standards for adoption by the NAIC.

With the Commissioner's leadership, the OIC adopted rules in 2019 to create more national standardization around license renewals.

In 2020, the Commissioner adopted legislation and regulations to align more closely with the adjuster licensing uniformity and reciprocity standards. This change included a more precise adjuster definition, added a continuing education requirement for resident adjusters, and a no-cost registration process for emergency adjusters who respond to Governor-declared disasters.

#### Modernization of Financial Surveillance Laws

The Commissioner successfully guided NAIC model laws through the 2015 and 2016 legislative sessions. His efforts enabled his office to retain NAIC accreditation and provide modern regulatory approaches to holding company regulation, credit for reinsurance, new reserving requirements for life insurers, and risk management practices. The Commissioner also received authority for an additional 3.2 employees to regulate these new approaches through analysis and examination. Enhanced solvency surveillance was

furthered in 2018 by Commissioner-requested legislation that mandates closer scrutiny of how insurers are governed internally.

Criminal Prosecution of Insurance Fraud

The Commissioner’s anti-fraud Criminal Investigations Unit (CIU) continues to have great success, receiving a record number of fraud referrals, investigations, and prosecutions during ~~2019~~ 2019-2021 biennium. The agency earned law enforcement re-accreditation from the Washington Association of Sheriffs and Police Chiefs. The CIU meets or exceeds all standards designated as best law enforcement practices in our state. Accreditation has increased operational effectiveness and professionalism. The Commissioner remains committed to pursuing the criminal prosecution of individuals who commit fraud against insurance companies or violate criminal laws in the context of insurance transactions. Recent legislation resulted in establishing a fraud surcharge and reducing the regulatory surcharge charged to companies currently paying OIC’s operations.

Captive Insurance Companies

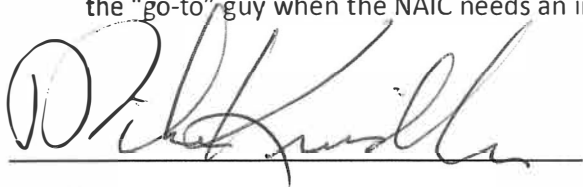
captive insurance company is often a wholly owned subsidiary created to provide insurance to its parent, often a major corporation. A captive operates like any commercial insurer – it issues policies, collects premiums, and pays claims, but it does not offer insurance to the public. The Washington Insurance Code does not allow captives to operate in the state unless the OIC grants a certificate of authority, or the insurance is sold through a licensed surplus lines broker.

The Commissioner discovered that many captives were operating illegally in Washington and not paying any premium tax. The Commissioner began investigations and enforcement actions against several companies. In the 2021 legislative session, the Commissioner successfully shepherded SB 5315 through the Legislature to the Governor’s desk, where it was signed, authorizing captive insurers to operate under the state’s insurance code. There are currently 27 registered captive insurers with over 6.3 million collected in restitution and loss prevention from criminal fraud cases.

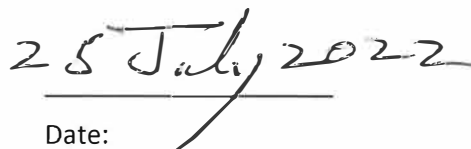
**7. General comments**

- **Please discuss anything else that may contribute to the understanding of your job responsibilities.**

As the most senior insurance commissioner in the country, well respected by his peers and their staff, Commissioner Kreidler exerts influence nationally and internationally on insurance regulation. He is also the “go-to” guy when the NAIC needs an insurance expert to testify on a variety of topics before Congress.



Signature:



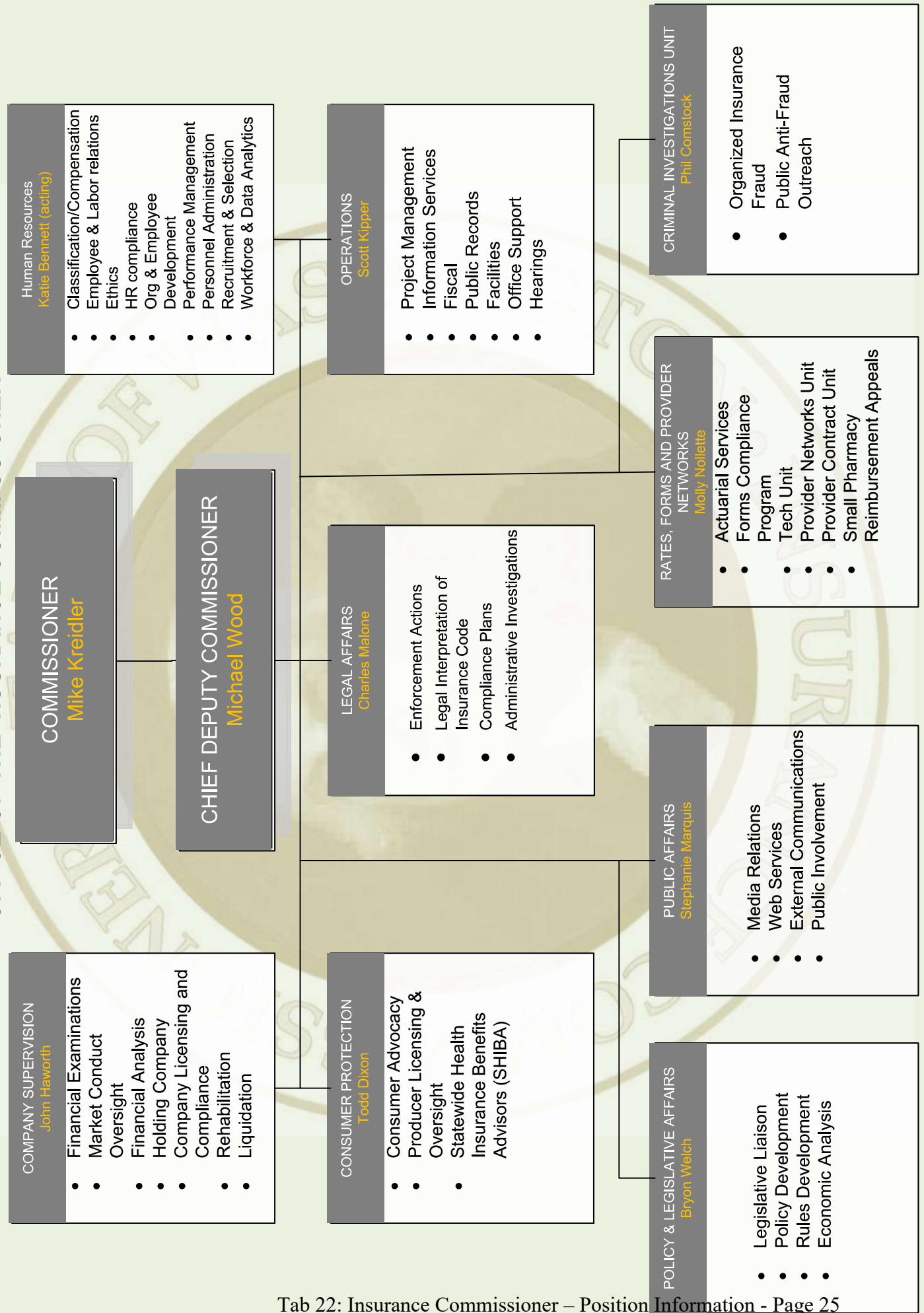
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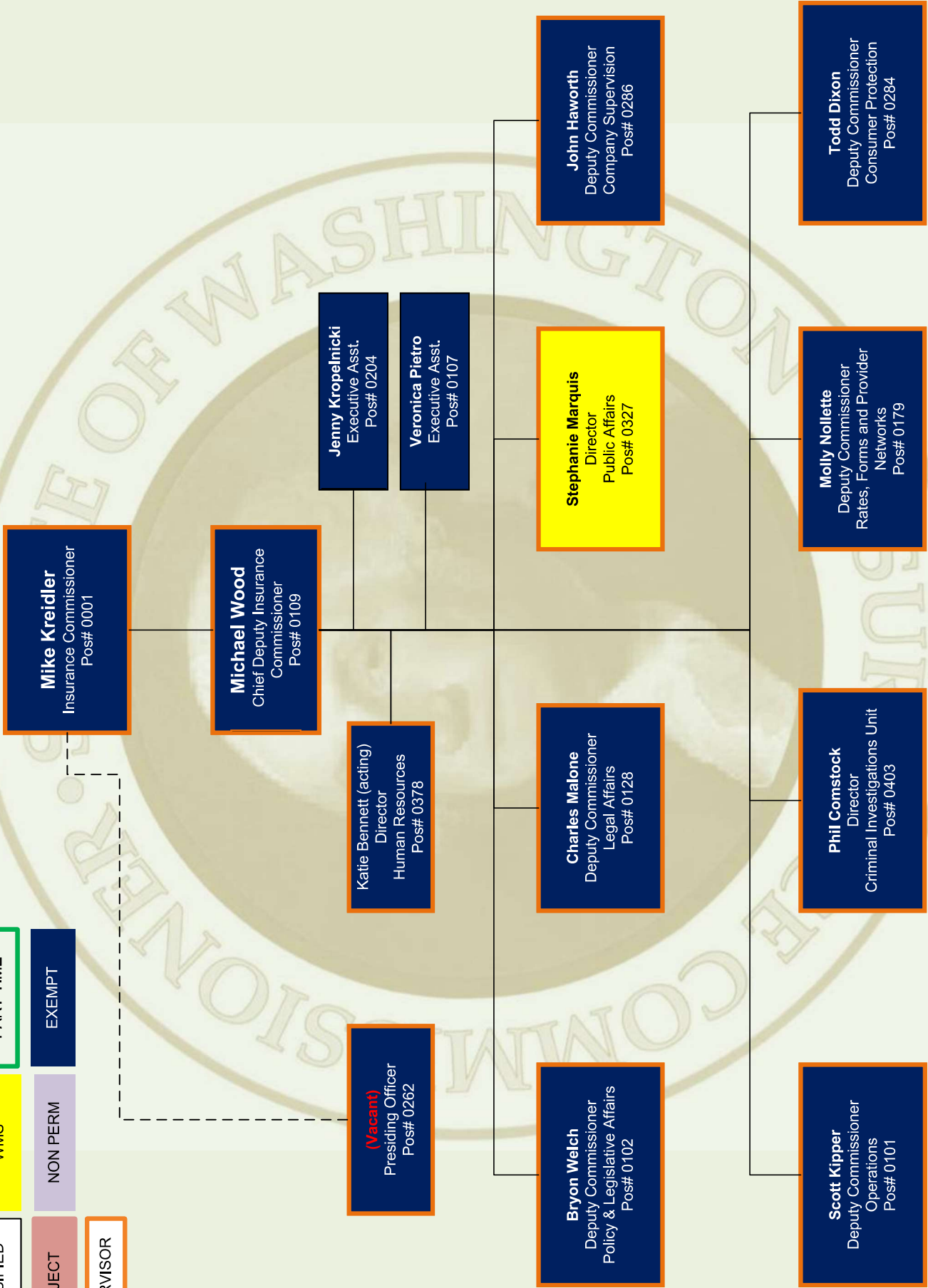
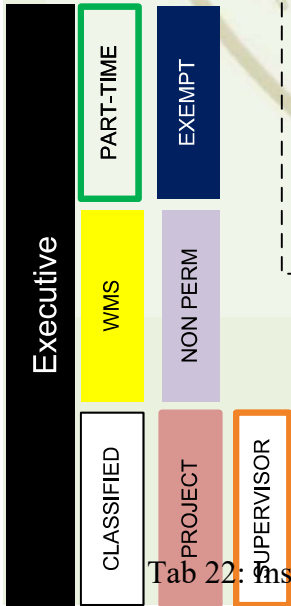
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# Agency Overview

## STATE OF WASHINGTON OFFICE OF THE INSURANCE COMMISSIONER





**Executive  
Human Resources**

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		

**Katie Bennett**  
Human Resources Director (Acting)  
Pos# 0378

**Phyllis Gratis**  
Human Resource  
Consultant 4  
Pos# 0534

**(Vacant)**  
Human Resource  
Consultant 4  
Pos# 0397

**Marc Osborn**  
Human Resource  
Consultant 4  
Pos# 0463

**Olivia May**  
Human Resource  
Consultant 2  
Pos# 0272

Company Supervision  
Overview

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		



**Company Supervision  
Financial Condition**

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		

**Financial Condition Examination**

**John Jacobson**  
Chief Financial Examiner  
Pos# 0310

**Tarik Subbagh**  
Assistant Chief Examiner  
Pos# 0337

**Amy Mosley**  
Administrative Assistant 3  
Pos# 0241

**Sarah Froyland**  
Financial Examiner 4  
Pos# 0531

**Steve Drutz**  
Chief Financial Analyst  
Pos# 0256

**Financial Condition Analysis**

**Nicole Bisping**  
Financial Examiner 4  
Pos# 0047

**Rodica Murphy**  
Financial Examiner 3  
Pos# 0390

**Joshua Parise**  
Financial Examiner 2  
Pos# 0197

**(Vacant)**  
Financial Examiner 2  
Pos# 0345

**Joyce Reynolds**  
Financial Examiner 4  
Pos# 0277

**Seth Mattison**  
Financial Examiner 3  
Pos# 0200

**Tien Vo**  
Financial Examiner 2  
Pos# 0330

**Scott Sevall**  
Financial Examiner 2  
Pos# 0426

**Timothy Hays**  
Investment Specialist  
Pos# 0414

**Constantine Arustamian**  
Financial Examiner 4  
Pos# 0355

**Randy Fong**  
Financial Examiner 4  
Pos# 0146

**(Vacant)**  
Financial Examiner 3  
Pos# 0036

**Edsel Dino**  
Financial Examiner 3  
Pos# 0099

**Zairina Othman**  
Financial Examiner 2  
Pos# 0254

**Branden Philpot**  
Financial Examiner 2  
Pos#0333

**Kathleen Hicks**  
Financial Examiner 4  
Pos# 0199

**Friday Enoye**  
Financial Examiner 3  
Pos# 0202

**Albert Karau**  
Financial Examiner 3  
Pos# 0343

**Cherrelle Pasia**  
Financial Examiner 2  
Pos# 0276

**Jonathan Yee**  
Financial Examiner 2  
Pos# 0347

**Susan Campbell**  
Financial Examiner 4  
Pos# 0263

**Katy Bardsley**  
Financial Examiner 3  
Pos# 0342

**James Koo**  
Financial Examiner 3  
Pos# 0045

**Cynthia Clark**  
Financial Examiner 2  
Pos# 0344

**Amina Mohammed**  
Financial Examiner 2  
Pos# 0437

**Company Supervision  
Market Conduct and Control**

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		

**(Vacant)**  
Market Conduct Oversight  
Manager  
Pos# 0400

**(Vacant)**  
Administrative Assistant 3  
Pos# 0134

**Market Conduct Analysis**

**Jason Carr**  
Chief Market Analyst  
Pos #0401

**Lisa Borchert**  
Functional Prog. Analyst 4  
Market Analyst  
Pos# 0415

**Stacey Whiteman**  
Functional Prog. Analyst 3  
Market Analyst  
Pos# 0417

**Lindsey Robles**  
Functional Prog. Analyst 3  
Market Analyst  
Pos# 0416

**Jeanette Plitt**  
Chief Market Conduct  
Examiner  
Pos# 0145

**Paul DuBois**  
Functional Prog. Analyst 4  
Sr. Mkt. Conduct Examiner  
Pos# 0229

**Anna S. Null**  
Functional Prog. Analyst 4  
Sr. Mkt. Conduct Examiner  
Pos# 0208

**Becca Hay**  
Functional Prog. Analyst 3  
Market Conduct Examiner  
Pos# 0230

**Carla Bailey**  
Functional Prog. Analyst 3  
Market Conduct Examiner  
Pos# 0228

**Pam Brannan**  
Functional Prog. Analyst 3  
Market Conduct Examiner  
Pos# 0352

**(Vacant)**  
Functional Prog. Analyst 3  
Market Conduct Examiner  
Pos# 0328

**Hal Bisnett**  
Functional Prog. Analyst 3  
Market Conduct Examiner  
Pos# 0478

**Market Conduct Inquiries**

**Company Licensing and Compliance**

**Mark Durphy**  
Company Licensing and  
Compliance Mgr.  
Pos# 0136

**Susan Baker**  
Functional Prog. Analyst 4  
Co. Licensing Specialist  
Pos# 0425

**Jeanmarie Aseron**  
Functional Prog. Analyst 3  
Co. Licensing Specialist  
Pos# 0329

**Dawn Krech**  
Functional Prog. Analyst 3  
Co. Licensing Specialist  
Pos# 0517

**Cathy Dill**  
Functional Prog. Analyst 3  
Co. Licensing Specialist  
Pos# 0346

**Sarah Gosney**  
Insurance Technician 3  
Pos# 0409

Alice Cryer  
Functional Prog. Analyst 3  
Co. Licensing Specialist  
Pos# 0524

**(Vacant)**  
Financial Examiner 2  
Co. Licensing Specialist  
Pos# 0467

**Holding Company**

**Ron Pastuch**  
Holding Company Mgr.  
Pos# 0393

**(Vacant)**  
Financial Examiner 3  
Pos# 0464

**Yasen "Ivan" Angelov**  
Financial Examiner 2  
Pos# 0442

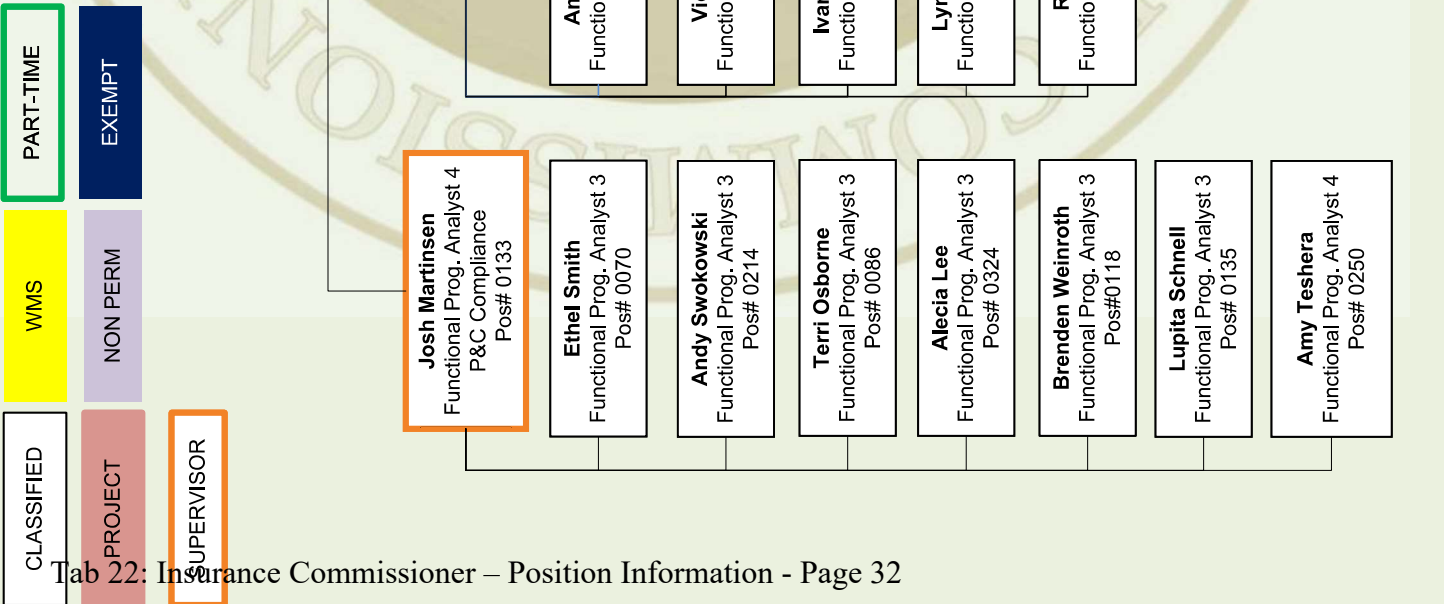
**Kristofer Graap**  
Financial Examiner 2  
Pos# 0516

Consumer Protection  
Overview

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		



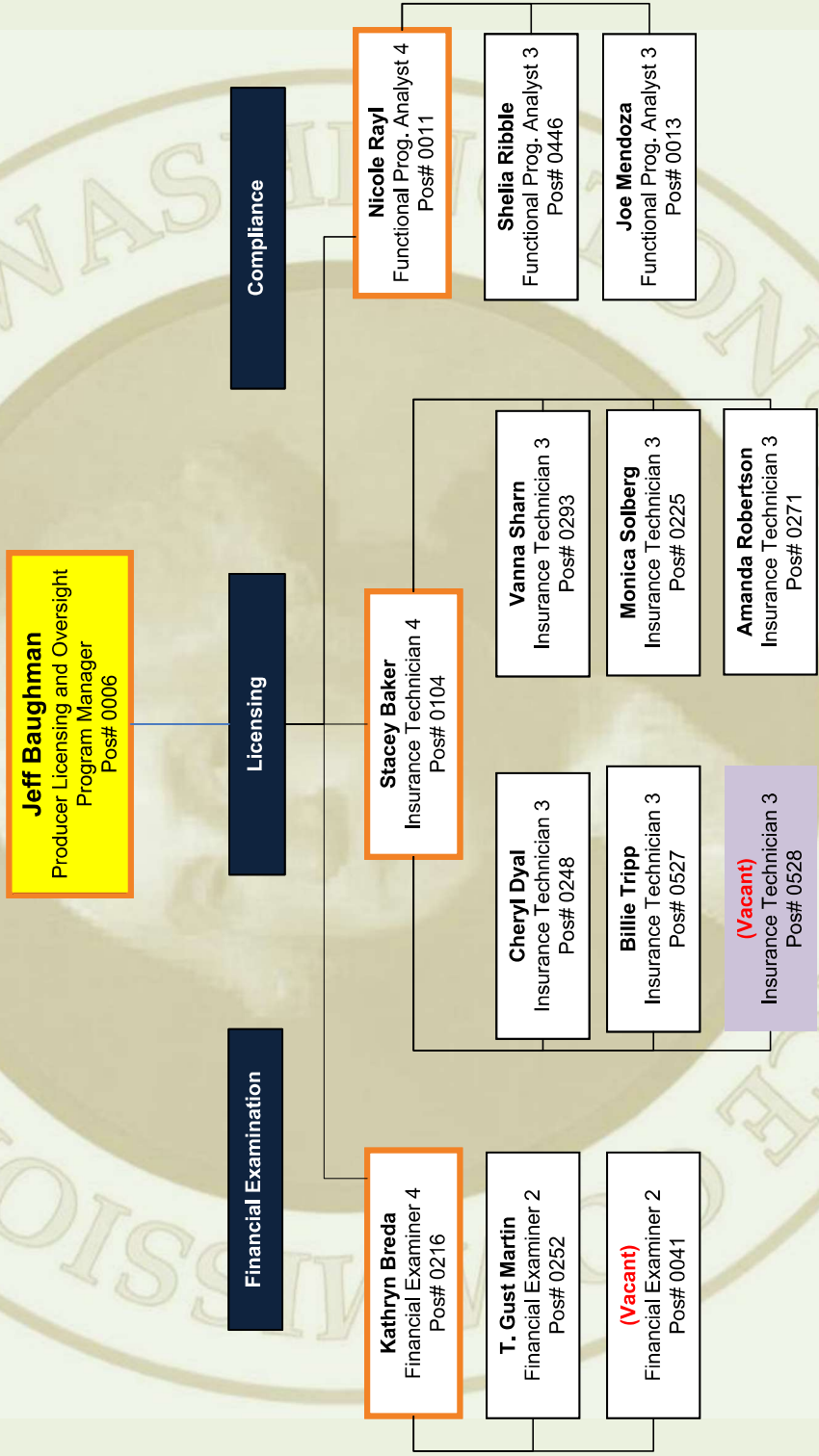
**Consumer Protection  
Consumer Advocacy**





**Consumer Protection  
Producer Licensing and Oversight**

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		



Consumer Protection  
SHIBA

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR	FEDERAL GRANT	

**Tim Smolen**  
SHIBA Manager  
Pos# 0389

**(Vacant)**  
Administrative Assistant 3  
Pos# 0226

**Field Operations**

**Ron House**  
Health Insurance Advisor 2  
Pos# 0249

**Jean-Marie Dymond**  
Health Insurance Advisor 2  
Pos# 0267

**Noreen Brisson**  
Health Insurance Advisor 1  
Pos# 0340

**Dale Ensign**  
Health Insurance Advisor 1  
Pos# 0112

**(Vacant)**  
Insurance Advisor 1  
Pos# 0339

**(Vacant)**  
Health Insurance Advisor 1  
Pos# 0268

**Amy Figoni**  
Health Insurance Advisor 1  
Pos# 0336  
50% Federal Grant

**(Vacant)**  
Health Insurance Advisor 2  
Pos# 0382

**Diana Schlesselman**  
Health Insurance Advisor 1  
Pos# 0253  
50% Federal Grant

**(Vacant)**  
Insurance Technician 3  
Pos# 0269

**Phillip Hartshorn**  
Health Insurance Advisor 1  
Pos# 0242

**(Vacant)**  
Insurance Technician 3  
Pos# 0512

**(Vacant)**  
Insurance Technician 3  
Pos# 0513

Legal Affairs

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		

**Charles Malone**  
Deputy Commissioner  
Pos# 0128

**Barb Bowen**  
Administrative Assistant 4  
Pos# 0026

**Sofia Pasarow**  
Attorney Manager  
Pos# 0438

**Tim Ascher**  
Ins. Enforcement Specialist  
Pos# 0383

**Sandra Mendez**  
Ins. Enforcement Specialist  
Pos# 0468

**Andrea Jensen**  
Ins. Enforcement Specialist  
Pos# 0507

**Deanna Ogo**  
Ins. Enforcement Specialist  
Pos# 0514

**Darryl Colman**  
Attorney Manager  
Pos# 0368

**Sonja Craddock**  
Paralegal 3  
Pos# 0529

**(Vacant)**  
Paralegal 2  
Pos# 0500

**Katrina Shepard**  
Paralegal 2  
Pos# 0335

**Lori Nelson**  
Paralegal 2  
Pos# 0009

**Joshua Pace**  
Legal Assistant 3  
Pos# 0452

**Tyler Robbins**  
Investigations Mgr.  
Pos# 0430

**Randi Osberg**  
Investigator 4  
Pos# 0245

**Erika Johnson**  
Investigator 3  
Pos# 0147

**(Vacant)**  
Investigator 3  
Pos# 0434

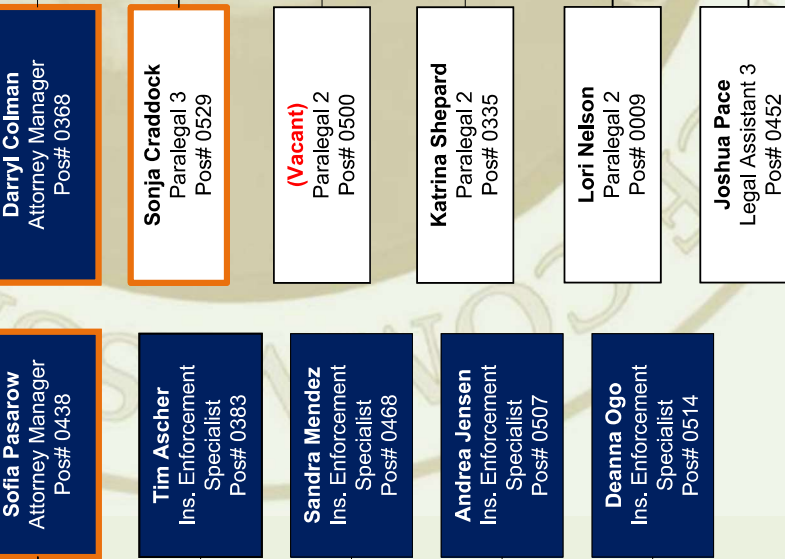
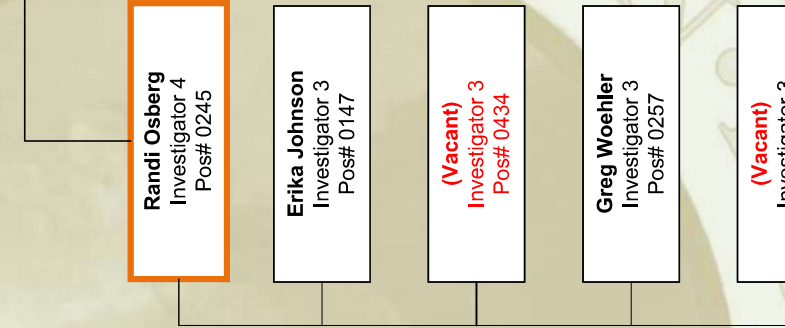
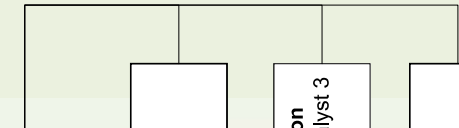
**Greg Woehler**  
Investigator 3  
Pos# 0257

**(Vacant)**  
Investigator 3  
Pos# 0222

**Wes Diaz**  
Investigator 3  
Pos# 0251

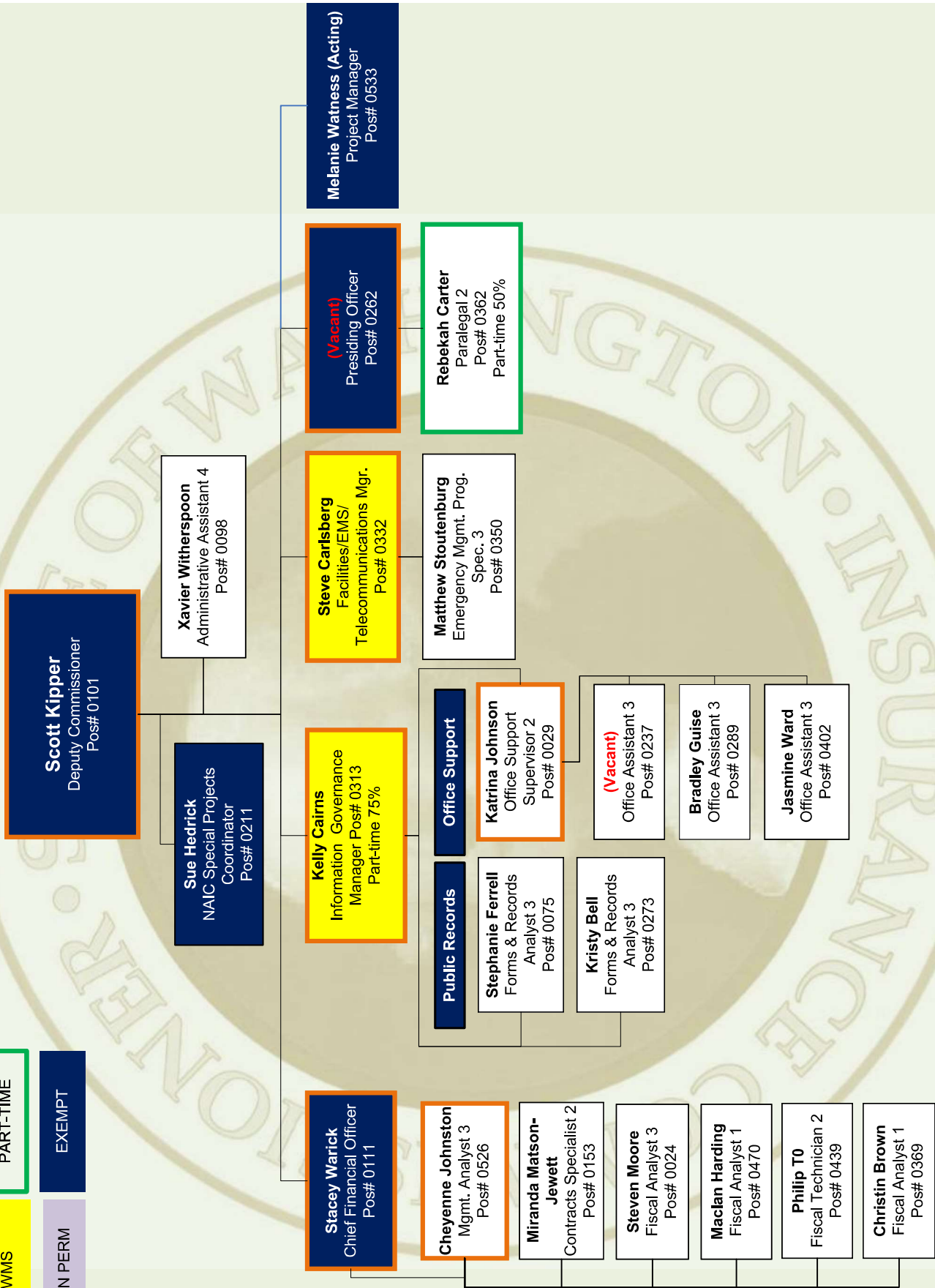
**Jessica Bullington**  
Functional Prog. Analyst 3  
Pos# 0361

**Rich OBrien**  
Investigator 3  
Pos# 0381



Operations

- CLASSIFIED
- PROJECT
- SUPERVISOR
- WMS
- PART-TIME
- NON PERM
- EXEMPT



**Operations**  
Information Technology

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		

**Scott Kipper**  
Deputy Commissioner  
Pos# 0101

**Justin Baisch**  
IT Policy & Planning  
Pos# 0301

**Paul Gronka**  
IT Policy & Planning  
Pos# 0418

**Kevin Curtright**  
IT System Administration  
Pos# 0288

**Julie Ryan**  
IT Customer Svc Support  
Pos# 0387

**Kevin Torgerson**  
IT Business Analyst  
Pos# 0475

**Suneetha Bachu**  
IT Architecture  
Pos# 0469

**Stephen Sureau**  
IT System Administration  
Pos# 0495

**Genny Gill**  
IT Customer Support  
Pos# 0458

**Adrienne Connolly-Poe**  
Quality Assurance  
Pos# 0305

**Jimmy Splaine**  
Application Development  
Pos# 0461

**Gregory Perryea**  
IT System Administration  
Pos# 0462

**Tifney Reins**  
IT Customer Support  
Pos# 0506

**Vyenna Kynull**  
Application Development  
Pos# 0443

**Dale Harris**  
IT Architecture  
Pos# 0411

**Chris Molenda**  
IT Architecture  
Pos# 0341

**John Burruss**  
IT Security  
Pos# 0408

**LaTisha Best**  
IT Quality Assurance  
Pos# 0379

**Jamie Terry**  
Application Development  
Pos# 0450

Policy & Legislative Affairs

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		

**Bryon Welch**  
Deputy Commissioner  
Pos# 0102

**Matthew Kamenz**  
Administrative Assistant 4  
Pos# 0445

**Rory Paine-Donovan**  
Legislative Liaison  
Pos# 0373

**(Vacant)**  
Assistant Legislative Liaison  
Pos# 0334

**Jane Beyer**  
Sr. Health Policy Advisor  
Pos# 0144

**Jay Bruns**  
Senior Climate Advisor  
Pos# 0489

**John Pestinger**  
Management Analyst 5  
Pos# 0493

**David Forte**  
SR. P&C Policy Advisor  
Pos# 0348

**Arielle Page Landstrom**  
Policy and Rules Mgr.  
Pos# 0420

**Michael Walker**  
Sr. Policy Analyst  
General Ins. Focus  
Pos# 0384

**Barbara Jones**  
Sr. Policy Analyst  
Health Care Focus  
Pos# 0321

**Andrew Davis**  
Policy Analyst  
P&C Focus  
Pos# 0323

**Simon Casson**  
Policy Analyst  
Economics & Data Focus  
Pos# 0410

**Shari Mater**  
Policy Analyst  
Health Care Focus  
Pos# 0505

**Jesse Wolff**  
Administrative Assistant 2  
Pos# 0317

**(Vacant)**  
Administrative Assistant 2  
Pos# 0491

Public Affairs

CLASSIFIED

WMS

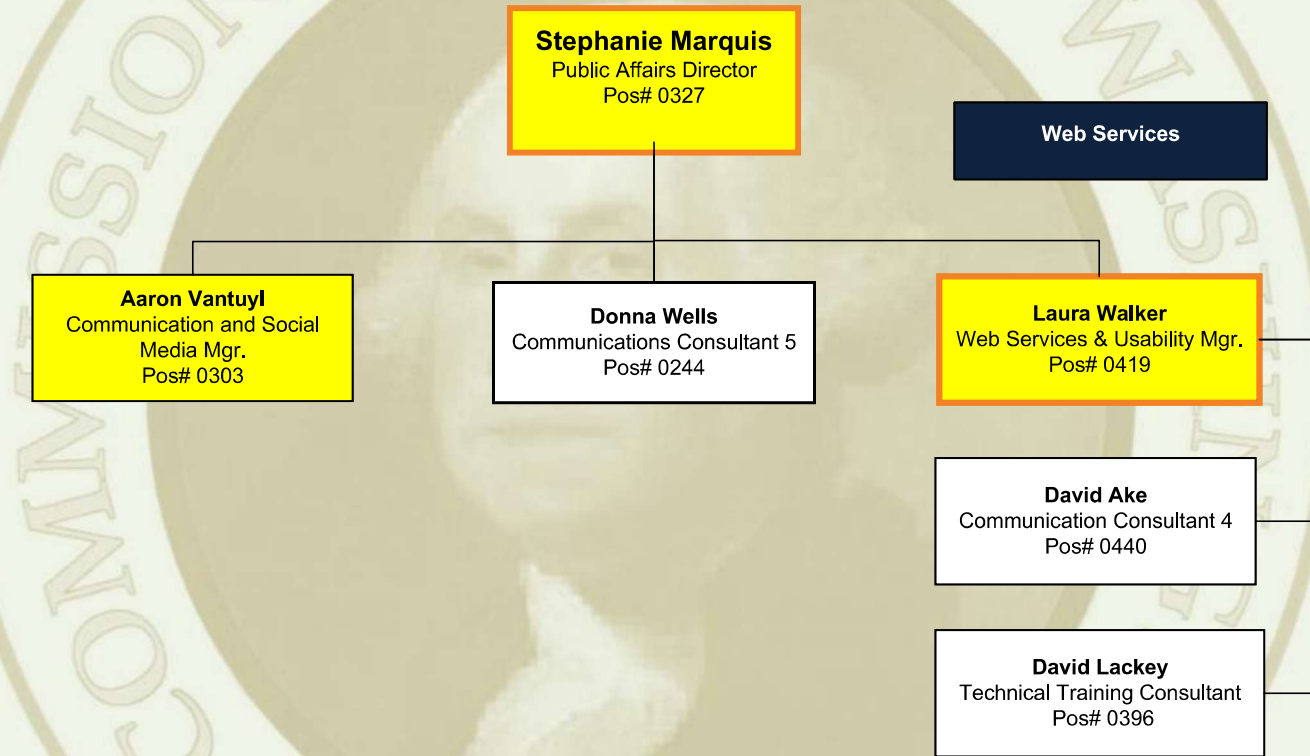
PART-TIME

PROJECT

NON PERM

EXEMPT

SUPERVISOR



**Rates, Forms and Provider Networks  
Provider Networks Oversight Program**

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		

**Molly Nollette**  
Deputy Commissioner  
Pos# 0179

**Jennifer Kreidler**  
Manager  
Provider Network Oversight  
Program Manager  
Pos# 0297

**(Vacant)**  
Administrative Assistant 2  
Pos# 0518

**Provider Networks Unit**

**Provider Contract Unit**

**Sara Hilliard**  
Functional Prog. Analyst 4  
Senior Provider Network  
Analyst  
Pos# 0504

**Darren Dezutter**  
Functional Prog. Analyst 4  
Senior Provider Contract  
Analyst  
Pos# 0501

**Stephanie Kemble**  
Functional Prog. Analyst 3  
Provider Network Analyst  
Pos# 0004

**Joanne Najdzin**  
Functional Prog. Analyst 3  
Provider Contract Analyst  
Pos# 0235

**Debbie Johnson**  
Functional Prog. Analyst 3  
Provider Network Analyst  
Pos# 0502

**(Vacant)**  
Functional Prog. Analyst 3  
Provider Contract Analyst  
Pos# 0465

**Courtney Taylor**  
Functional Prog. Analyst 3  
Provider Network Analyst  
Pos# 0503

**Tom Bolender**  
Functional Prog. Analyst 3  
Provider Contract Analyst  
Pos# 0466

**Vacant**  
Functional Prog. Analyst 3  
Provider Network Analyst  
Pos# 0509

**Desiree' Rosenberg**  
Functional Prog. Analyst 3  
HCBM Forms Analyst  
Pos# 0525

**Aaron Deggs**  
Functional Prog. Analyst 3  
Provider Contract Analyst  
Pos# 0530



**Rates, Forms and Provider Networks**

- CLASSIFIED
- PROJECT
- SUPERVISOR

- WMS
- NON PERM

- PART-TIME
- EXEMPT

**Molly Nollette**  
Deputy Commissioner  
Pos# 0179

(Vacant)  
Administrative Assistant 4  
Pos# 0213

**Forms Compliance Program**

**Ned Gaines**  
Forms Compliance Manager  
Pos# 0082

**Tech Unit**

**Gail Jones**  
Management Analyst 4  
Pos# 0349

**Kim Tocco**  
Health Forms Program  
Manager  
Pos# 0315

**Dennis Godwin**  
Functional Prog. Analyst 4  
Sr. Insurance Policy &  
Compliance  
Pos# 0372

**Dan Connolly**  
Functional Prog. Analyst 3  
Insurance Policy &  
Compliance  
Pos# 0234

**Mary Kay Schaefer**  
Functional Prog. Analyst 3  
Insurance Policy &  
Compliance Analyst  
Pos# 0238

**Todd Merkley**  
Functional Prog. Analyst 3  
Insurance policy &  
Compliance Analyst  
Pos# 0182

**Julia Hinrichs**  
Functional Prog. Analyst 4  
Senior Health Forms  
Compliance Analyst  
Pos# 0290

**Carla Napper**  
Functional Prog. Analyst 3  
Health Forms Compliance  
Analyst  
Pos# 0131

**Alec Sorensen**  
Functional Prog. Analyst 3  
Health Forms Compliance  
Analyst  
Pos# 0181

**Kenneth Walker**  
Functional Prog. Analyst 3  
Health Forms Compliance  
Analyst  
Pos# 0532

**Chris Bauer**  
Functional Prog. Analyst 3  
Health Forms Compliance  
Analyst  
Pos# 0413

**Wendy Conway**  
Functional Prog. Analyst 4  
Senior Health Forms  
Compliance Analyst  
Pos# 0258

**Addie Hawkins**  
Functional Prog. Analyst 3  
Health Forms Compliance  
Analyst  
Pos# 0455

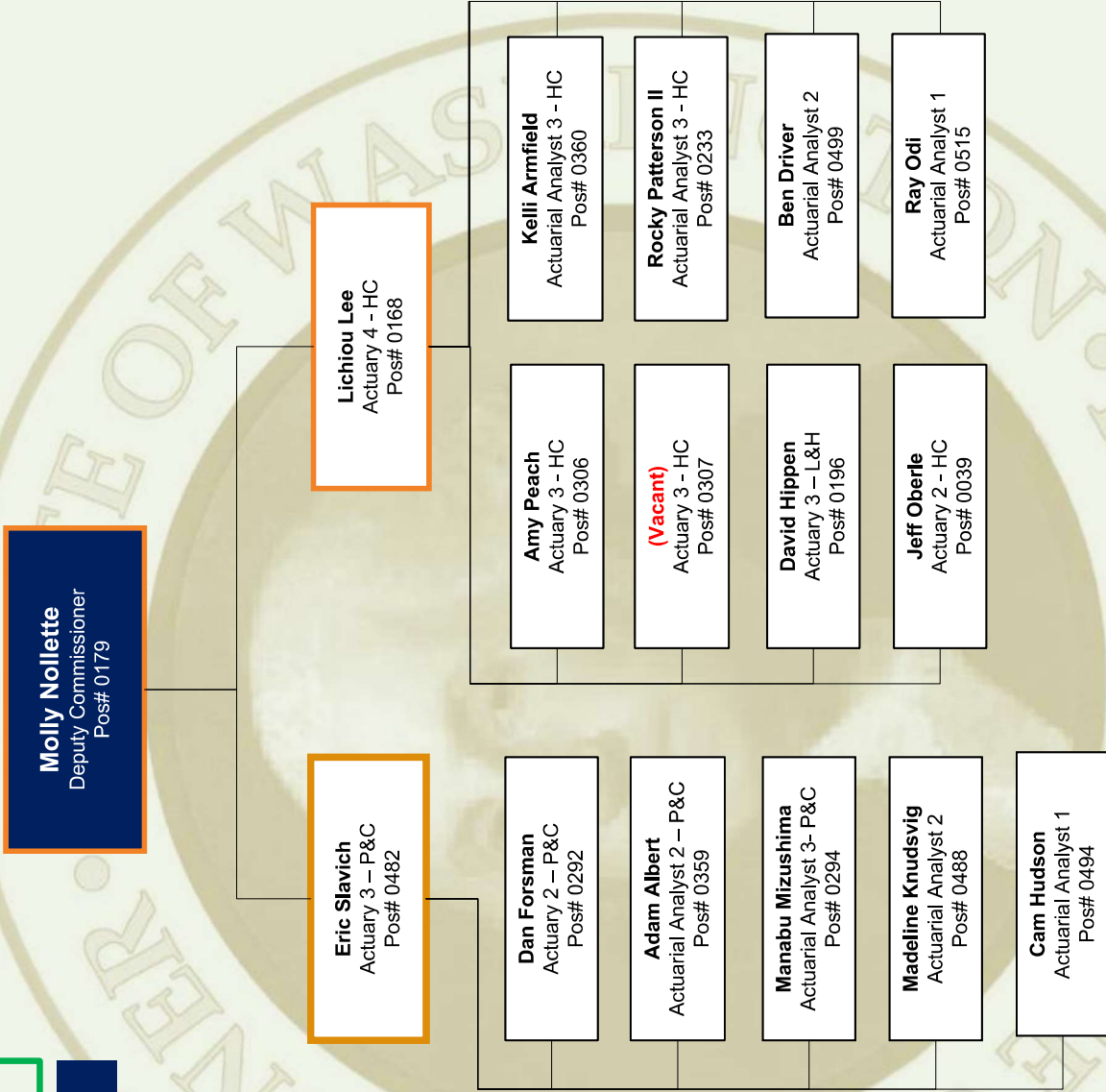
**Alyson Bragg**  
Insurance Technician 3  
Pos# 0094

**Jean Ann Eksund**  
Insurance Technician 3  
Pos# 0240

**Nikki Meador**  
Insurance Technician 3  
Pos# 0083

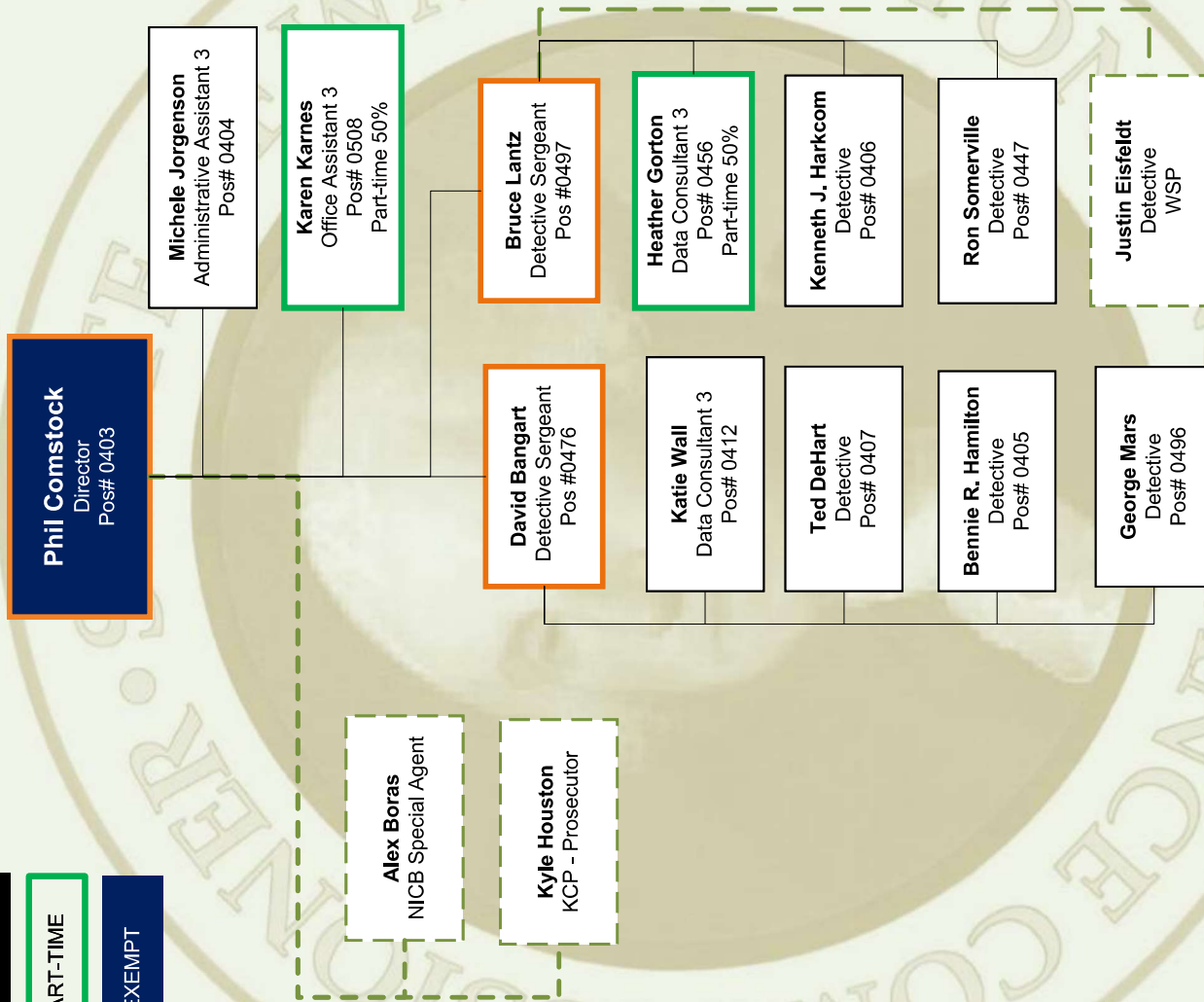
**Rates, Forms and Provider Networks  
Actuarial Services**

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		



**Criminal Investigations Unit**

CLASSIFIED	WMS	PART-TIME
PROJECT	NON PERM	EXEMPT
SUPERVISOR		



OIC Employee Salaries > \$140,110  
as of 07/01/2022

Full Name	Job	Organizational Unit	Annual Salary
KREIDLER, MYRON	INSURANCE COMM	INSURANCE COMMISSIONER	140,110.00
HAWORTH, JOHN	DEPUTY INSUR COM	Company Supervision	143,052.00
MALONE, CHARLES	DEPUTY INSUR COM	Legal Affairs	143,052.00
WELCH, BRYON	DEPUTY INSUR COM	Policy & Legislative Affairs	143,052.00
KIPPER, SCOTT	DEPUTY INSUR COM	Operations	143,052.00
DIXON, MATTHEW	DEPUTY INSUR COM	Consumer Protection	147,348.00
NOLLETTE, MOLLY	DEPUTY INSUR COM	RATES, FORMS & PROVIDER NETWORKS	147,348.00
WOOD, MICHAEL	DEPUTY INSUR COM	EXECUTIVE	152,304.00
SLAVICH, ERIC	ACTUARY 3	RFPN / Actuarial Services / P&C	169,704.00
PEACH, AMY	ACTUARY 3	RFPN / Actuarial Services / HC	169,704.00
HIPPEN, DAVID	ACTUARY 3	RFPN / Actuarial Services / HC	169,704.00
LEE, LICHIOU	ACTUARY 4	RFPN / Actuarial Services / HC	192,036.00