

The Honorable Stephen Taylor
Commissioner
Department of Insurance, Securities, and Banking
810 First Street, N.E., Suite 710
Washington, DC 20002

Dear Commissioner


Taylor:

As a former Executive Director of one of the hundreds of small nonprofits headquartered in the District of Columbia, I write to register my opposition to the proposal before DISB to undermine the soundness of CareFirst's reserves. I am particularly concerned about using any portion of the reserves paid in by CareFirst subscribers for anything other than their own health care needs.

It should be evident to all that many small nonprofits struggle to meet their financial needs, and a top priority of these small nonprofits is to provide health insurance coverage for their employees. Whether the premiums are paid directly by the small nonprofit employer or out of the salary provided to the employee by the small nonprofit employer, the effect is the same. Limited dollars are used to cover the health needs of the employees that work in the hundreds of small nonprofits in the District of Columbia. Obviously, if the premiums are too high for any given period and the reserves are accordingly found to be excessive, then those premium dollars still belong to the CareFirst subscribers who paid them and should be either rebated or used to pay for the subscriber's upcoming premiums.

In no case should the District of Columbia "take" or "divert" these premiums for other needs in the District, no matter how compelling those needs may be. If those needs are so pressing, then District officials should find a legitimate way to raise revenue to cover them rather a back door grab of the premiums paid by small nonprofits seeking to provide coverage for their employees.

Sincerely,

A handwritten signature in cursive script that reads "Aubrey Sarvis".

Aubrey Sarvis

Former Executive Director, Servicemembers Legal Defense Network