

Rules coordinator (policy)

Reference #	12432809
Status	Complete
First name	Vernon
Last name	Schrag
Email	dwights30@comcast.net
Phone number	425-443-7958
Rule number/topic	Transparency in Insurance Underwriting R2021-17
Comment(s) or question(s)	<p>As an interested Party with ongoing OIC Record Complaint Filing Cases #1668213 & #1661232 for PUBLIC RECORD, I request all my submittals for my Complaints 2021 & 2022 be considered in these Consumer Protection and Elder Abuse issues. These include all "Download Documents" submitted for PUBLIC RECORD to WA OIC. Also, any I may download/comment in future months as well; or may be submitted on my behalf by Legal Aid or other private agencies or DSHS public officials/ALTSA and so forth. Thank you. AND</p> <p>More specifically the vitally important elements of urgency for Consumer Protections: and USPS mailings sent by me during March and April, 2022. See noted 4-9-2022 comments and Uploads regarding 2022 LTC Policy Rate Hikes by GLIC-Genworth on this date, QUOTE:</p> <p>April 9, 2022 - Requested via Priority USPS Letter to Olympia offices Attn: PROGRAM MANAGER - State Unit on Aging/Aging and Long-Term Support Administration in</p>

Washington State Department of Social and Health Services. Requesting a referral for legal aid and support; and urging notification to WA Governor Inslee; Governors Legislative & Policy Office; Washington State Council on Aging; and many State agencies in ALTA and DSHS' network of Legal Aid; Private/Non-profits and others. Specifically those tasked with advising the Governor, the DSHS Secretary and the Assistant Secretary of ALTA. (RCW 43.20A.695) ... Also urged, "Please FAX to OIC" re: See Four (4) pages enclosure per download today, April 9, 2022 for OIC Online – Schrag COMPLAINT Reference File # Cases #1668213 & #1661232.

Immediate Action should be taken by WA OIC Commissioner Kreidler and OIC Legal Staff to...

... prepare reports to WA State LTC Insurance Consumers who badly need such information to help them in decision-making during 2022 Rate Hike Requests from Genworth (GLIC) that they will be receiving in the mail due to GLIC' using "Speed to Market STM tools". WA Consumers must respond quickly in order for WA Consumers to keep their LTC policies in force, but having no information, legal support or data to help them. Genworth Policyholders deal with high-pressure surprise billings, likely corrupt, unethical and egregious price increases expected during 2022-2023 Rate Increase Cycle approvals foolishly given by WA OIC. More Elder Abuse is unacceptable in WA State by our government officials or private business entities. PLEASE See Download Document File input today. FOR PUBLIC RECORD – Vernon Schrag

Upload up to 5 files (20MB max. file size per file) [WA-OIC_CASE_2021-2022-_Genworth_LTC_Policies.pdf \(276 KB\)](#)

Last Update 2022-04-09 09:41:37

Start Time 2022-04-09 09:22:56

Finish Time 2022-04-09 09:41:37

IP 73.140.20.175

Browser Safari

Device Desktop

Referrer <https://www.insurance.wa.gov/contact-rules-coordinator>

Vernon D. Schrag
1106 108th Ave NE Apt. 302
Bellevue, WA 98004

Submission Enclosure &
Vernon Schrag Letter to
DHS/ALTA/HCS 4-8-2022

April 7, 2022

OIC COMPLAINT FILES Cases #1668213 & #1661232

WA OIC 12-21-2021 Genworth LTC Filing Description:

Requested Value:

RE: Genworth Life Insurance Company (GLIC)

Company NAIC No: 70025

Policy Forms: 7042 et al, 7044 et al, 7042 Rev et al, 7044 Rev et al, 7052 et al
The referenced filing is a Long Term Care (LTC) rate schedule change request submitted for your review and applies to the referenced policy forms. This filing was prepared with the **intention of following the Speed to Market (STM) tools.**

In this filing, to comply with WAC 284-83-090(2)(b), GLIC requests a premium rate increase of 82.8% on the above-mentioned policy forms. However, GLIC does acknowledge the Departments position concerning large rate increases and is willing to accept a premium rate increase of 30%, which will enhance premium adequacy but will not be sufficient to prevent further rate increases.

FOIA Document 12-21-2021_30% INCREASE
PAGES 40, 53 & 55:

Page 40:

NOTE: "Anti-Selective Shock" Hardship to many WA Policyholders!!!

Comments: The magnitude of the proposed rate increase seems likely to represent an unexpected hardship to many of the policyholders, resulting in unanticipated anti-selective shock lapses.

In lieu of one large rate increase, please propose two smaller rate increases. These should be calculated to reduce lapses and anti-selection that often result from large rate increases. A demonstration of such calculations, whether for a single rate increase or for a series of smaller rate increases, satisfactory to the commissioner, shall be attached to the filing. [WAC 284-54-630(6)]

Although multiple years of a phased-in increase will be considered at this time, the company will need to submit separate rate filings for each future phase rate increase when the company is ready to implement each future phase rate increase.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Vernon D. Schrag
1106 108th Ave NE Apt. 302
Bellevue, WA 98004

Response 2

Comments:

2) As detailed in Section 8 of the Actuarial Memorandum and the Policy Form Pooling Explanation document included with this filing, GLIC does not include partial credibility in either the setting of assumptions or the calculation of rate increase amounts.

However, at the request of the Department, the Actuarial Memorandum included an analysis of the effects that accounting for partial credibility would have on the assumptions used for each product. The conclusion of this analysis is that changes in the assumptions to account for partial credibility would be immaterial to the projections and the rate increase request.

Additionally, rate increase amounts are calculated based on nationwide experience and the history of rate increases in a particular state. However, the nationwide experience is replaced with a states own experience only if that states experience is both fully credible and the resulting lifetime loss ratio is significantly different (defined as 2 or more standard deviations from the mean) from the nationwide lifetime loss ratio.

Washington's experience on these products does not meet these criteria. As discussed in the Actuarial Memorandum, this methodology is in compliance with both ASOP 25 and the LTC Credibility Monograph.

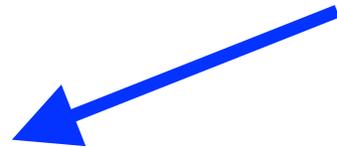
Page 53:

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In the submitted actuarial memorandum, we include detailed rate increase justification and we demonstrate that this premium rate increase satisfies

Vernon D. Schrag
1106 108th Ave NE Apt. 302
Bellevue, WA 98004

Long Term Care regulatory requirements of Washington and the Rate Stability regulation.

GLIC will offer insureds affected by the premium increase several alternative options to change their benefits in order to Maintain a premium rate level reasonably similar to what they were paying prior to the rate increase.

The benefit and rate combinations are consistent with the rate tables approved by the Department. GLIC has also invested in developing new alternatives that mitigate all or part of the proposed premium increase while still providing meaningful protection. One of these new alternatives, included in this filing for policy forms 7042 et al, 7044 et al, 7042 Rev et al and 7044 Rev et al, is called the Stable Premium Option.

Details on the available alternative options are presented in section 6 of the Actuarial Memorandum.

Thank you for your assistance in reviewing this filing.

Prior Value:

RE:Genworth Life Insurance Company (GLIC)

Company NAIC No: 70025

Policy Forms: 7042 et al, 7044 et al, 7042 Rev et al, 7044 Rev et al, 7052 et al

Page 55:

Post Submission Update Request Processed On 05/17/2021

Status:

Disallowed

Created By:

Ronald Jackson

Processed By:

Amy Peach

Comments:

The final filing disposition will address the final rate change. For record-keeping purposes, we want to preserve the initial rate change request that was submitted.

General Information:

Field Name	Requested Change	Prior Value	Overall Rate Impact
	30	82.8	

Company Rate Information:

Company Name: Genworth Life Insurance Company

Field Name

Field Name	Requested Change	Prior Value
Overall % Indicated Change	30.000%	82.800%
Overall % Rate Impact	30.000%	82.800%
Written Premium Change for this Program \$10467043		\$28889037
Maximum %Change (where required)	30.000%	82.800%
Minimum %Change (where required)	30.000%	82.800%

From: [VERNON SCHRAG](#)
To: [Walker, Michael \(OIC\)](#)
Subject: LTC CONSUMER INPUT - Transparency in insurance underwriting (R 2022-01)
Date: Saturday, April 9, 2022 12:29:34 PM

External Email

Dear Policy Analyst Walker:

As a Consumer and interested party of my wife's and my own Long Term Care Policy of over 20 years, I reviewed Powerpoint files & Agenda Topics for your April 21st Zoom Meeting.

Also, we noted the "CR-101 COMMENTS" push-back OIC already received from CAMBIA; APCIA & NAMIC. These groups do not seem to have a grasp of real and financially harmful practices or impacts on Seniors of recent pricing practices for LTC policies. Rule-making is long overdue for consumer protections.

Please ask these organizations/lobbyists to review Consumer inputs for 2021 & 2022 Consumer Issues with the current lack of Rules in WA OIC procedures for ethical and professional analyses of **Annual LTC Rate Approvals pricing requested over 82% in 2021; and another 113% Price/Rate Increase for 2022-2023.**

From 8+ years of our ongoing PUBLIC RECORD Complaint File submittals, we explained why there's vital need to fix the mess with OIC Approval rules/policies; public data; WA State government data-transparency and Insurance Policy transparency & disclosures re:

OIC Complaint Actions Online – Schrag COMPLAINT Reference File # **Cases #1668213 & #1661232.**

OIC Robert Solano is aware of both complaint files and today I provided a request to provide the entire file content for your Rule Team Members to consider.

Yesterday we requested that DSHS provide our information via FAX to OIC for a more in-depth and careful review. Other WA Agencies should also assess these matters. Everyone seems to be "pointing the finger" at each other?? Now what?

I'm available and willingly volunteer to provide you and entire OIC team my informed WA "Consumer Based Input" plus powerpoint file to clarify and simplify these complex rules into simple, concise and transparent terms to help Commissioner Kreidler and Governor Inslee understand urgent actions needed for Consumer Protections.

Long Term Care Insurance is front and center as our current Legislature knows so well.

Way back on March 5, 2014 I received a response letter from Jim Keogh, OIC Policy and Rules Manager, to proposed LTC Rule making for extensive WA LTC premium recommendations.

Jim Keogh Quote: ... *"The Commissioner, as a member of the National Association of Insurance Commissioners, is continuing to follow this issue along with other state insurance commissioners in order to find solutions which will minimize premium increases while ensuring the continued financial viability of long-term care insurance plans. If you have any specific recommendations with regard to changes that could be made in the Washington Administrative Code he would appreciate those."*

Please ask the Commissioner what has been done regarding these matters in the past 8 years. Maybe your Committee can resolve these issues for benefit of Consumers instead of only for Insurance' Corporate interests? Whose financial viability is most at risk?

Take a close look at today's download file for Vernon Schrag - OIC Complaints. It seem very clear where the risk is focused in reviewing FOIA OIC document files.

Even better idea may be (also) querying Interested Party members of CAMBIA, APCIA & NAMIC since their initial comments don't support or offer real solutions for essential/vital OIC-Rulemaking actions? Why is that?

Thank you for considerations.

Please pass it on for your Committee's kickoff membership orientation. And also add refer these specific email Consumer Focused Comments to CR-101 Interested Party Agenda topics.

Best regards,
Vernon Dwight Schrag
425-443-7958

re: 2021-2022 OIC PUBLIC RECORD COMPLAINT Reference File **Cases #1668213 & #1661232.**

From: [VERNON SCHRAG](#)
To: [Wolff, Jesse \(OIC\)](#)
Cc: [Walker, Michael \(OIC\)](#)
Subject: Fwd: Genworth Left Policyholders In the Dark About Years-Long Plan to Hike Long-Term Care Premiums, Class Action Alleges
Date: Tuesday, April 12, 2022 12:36:18 PM

External Email

Dear Jesse: Good Afternoon!

Regarding "Transparency" for OIC Considerations (R 2202-1) please make record for this Class Action Report link to "Genworth Failure to Inform Policyholders" is entered into the Hearing Review Files for April 21, 2022 ZOOM Meeting Kickoff.

As a Customer/Consumer of GLIC I personally experienced these FAILURES ongoing right until today. So important for Commissioner Kreidler to get on top of this vital matter.

Are you able to receive a Pdf File Copy of a 6 page PPT via email?? ... As a HANDOUT for Participants re: inputs for LTC Consumer/Customer Interested Parties?

Thank you.

Best regards,
Vernon Dwight Schrag
Consumer Interested Party
Bellevue, WA 98004
425-443-7958

re: 2021-2022 OIC PUBLIC RECORD COMPLAINT Reference File **Cases #1668213 & #1661232.**

----- Original Message -----

From: dwight sch <[dwights30@gmail.com](mailto:dwrights30@gmail.com)>

To: [dwights30@comcast.net](mailto:dwrights30@comcast.net)

Date: 04/12/2022 10:06 AM

Subject: Fwd: Genworth Left Policyholders In the Dark About Years-Long Plan to Hike Long-Term Care Premiums, Class Action Alleges

----- Forwarded message -----

From: **dwight sch** <[dwights30@gmail.com](mailto:dwrights30@gmail.com)>

Date: Tue, Apr 12, 2022 at 8:27 AM

Subject: Genworth Left Policyholders In the Dark About Years-Long Plan to Hike Long-Term Care Premiums, Class Action Alleges

To: dwight sch <[dwights30@gmail.com](mailto:dwrights30@gmail.com)>

Cc: <MichaelW@oic.wa.gov>

<https://www.classaction.org/news/genworth-left-policyholders-in-the-dark-about-years-long-plan-to-hike-long-term-care-premiums-class-action-alleges>

From: [VERNON SCHRAG](#)
To: [Walker, Michael \(OIC\)](#)
Subject: Re: LTC CONSUMER INPUT - Transparency in insurance underwriting (R 2022-01)
Date: Tuesday, April 12, 2022 3:28:33 PM
Attachments: [image001.png](#)
[WA OIC CR-101 Comments \(R 2022-01\).pdf](#)

External Email

Dear Michael Walker:

Thank you so much for explaining the rule making process and upcoming goals for the initial meeting. It was very helpful and I certainly agree with need for developing next steps, strategies and so forth. ... I plan to listen and learn.

Enclosed 6 pp. pdf file/Powerpoint is rudimentary/simplified info but is backed by over 8 years of deep dives into Consumer Protection matters for LTC Policyholders.

This was put together for introducing a Policyholder's Consumer viewpoint to OIC and others. And largely driven by reading comments of APCIA; NAMIC and CAMBIA that were posted in your upcoming Agenda Topics.

Timeliness of actions is important too. Restated below are eight (8) recommendations included in my earlier **USPS mailing Request to OIC Commissioner; and downloaded into my OIC Complaint File docs.**

At the appropriate time/place please pass it on for your Committee's kickoff membership orientation. And as appropriate, also add/refer these specific email Public Record Consumer Focused Comments to CR-101 Interested Party Agenda topics. Thank you.

Best regards,
Vernon Dwight Schrag
LTC Policyholder - Interested Party
425-443-7958

.....

"Most vulnerable people must not be targeted by Corporate fraud, greed or lack of ethical standards. Please respond and address each of these vitally important steps/practices enclosed."

Thank you. Sincerely, Vernon Dwight Schrag

Commissioner Enclosure – Eight (8) Recommendations/Key Actions protecting WA LTC Policy Holders with Formal Steps WA OIC is requested to take before June 30, 2022. FOR PUBLIC RECORD ACTION STEPS & PUBLIC DISCLOSURES.

Prior to WA OIC Official Analyst Reviews by "LTC Actuaries" of proposed 114% Genworth LTC Premium increases (or other amounts/greater/less) **2022-2023 LTC**

Policies held by Resident Washingtonians:

1. Review Virginia Federal Court Decisions of February 2022 to determine if the OIC Commissioner's review process allows for unintentional or intentional complicity, errors or flaws in bypassing Consumer Protections (and for WA State statutes & policy/code provisions). Very important to have clarity and disclosure for WA State Public and Legislature, plus voters and taxpayers.
2. Provide a full disclosure of annual Policy Price increase requests & actual approvals given by WA OIC to Genworth Insurance. Simple descriptive letter: e.g. Annual Genworth Request versus OIC Approved percentage increases passed on to WA Policyholders; and why increases were approved.
3. Provide Public Information Notice(s) prepared by WA OIC in advance to Policyholders EACH year that will/have been impacted by lack of protections against fraud, corruption or insufficient reviews by WA OIC Analysts.
4. Provide Annual Official WA OIC letter to Genworth LTC about Consumer Advocacy actions underway to protect elderly policyholders; and copy to Consumers and Sales Agents in WA State. Provide these to Policyholders.
5. Determine Genworth Corporate policy that avoids/disallows informing impacted LTC consumers of "future financial failure" for the company if they're unable to get WA OIC agreements for price increases in WA State
6. Determine how many years longer that Genworth claims they will/can "survive" financially as a company; and potential impacts on WA State if WA OIC presents claims situation to Administrative Court Judges, recommending "Full rejection of policy price increases" requested by Genworth LTC.
7. Describe in writing to WA Consumers and Legislature what happens to LTC Policies in force if Court Hearing Judge(s) agrees with WA OIC Policy Review position of level premiums going forward, years 2022 onward.
8. Report to WA Legislators on matters of why/why not WA LTC policies that Genworth Insurance NO LONGER OFFERS FOR SALE should be frozen at present levels of premium payments until District Court Judge makes their final decision.
Provide this information to the WA State Attorney General. NOTE: OTHER RECOMMENDED WA OIC STEPS & ACTIONS MAY FOLLOW

On 04/11/2022 8:35 AM Walker, Michael (OIC) <michael.walker@oic.wa.gov> wrote:

Hello Vernon Dwight Schrag,

Thank you for your email and contacting the Washington State Office of the

Insurance Commissioner (OIC) with your interest in rulemaking.

In your email, you asked several questions, which I will attempt to answer in the order they were presented, as follows:

1. *Who was informed of these Rules Sessions as Interested Parties?*
 - a. The OIC uses several communication channels to provide notice of administrative rulemaking and interested party meetings. These channels include email, GovDelivery(Listserv applications), Twitter, agency websites, and via telephone, as well as email correspondence. The OIC is not able to produce an exact list of those who were notified, as their may be some who were notified by visiting our website, whereas others may have been indirectly notified via GovDelivery notifications, or Twitter updates.

2. *More specifically were any WA State Agencies that support Senior Citizens, Aging or Health and Safety? King County? If not, ... Why Not? AARP/SCOA/DSHS/BNAC/STATE OMBUDSMAN/ALTSA ADMINISTRATION?*
 - a. WA State Agencies and organizations that support Senior Citizens, Aging or Health and Safety, or King County may have been notified by the OIC's rulemaking and interested party notifications. The OIC's rulemaking and interested party notifications are sent through multiple correspondence channels and if any of these interested groups have a desire to participate in administrative rulemaking, insurance, or regulations affecting either, then they may have previously signed up, registered, or visited the OIC website to receive related updates. However, OIC did not prepare or process notifications that are specific to WA State Agencies, or other organizations. Instead, OIC publishes general rulemaking information, such as that included for interested party meetings, to ensure anyone who is interested is able to participate in the administrative rulemaking processes.

The OIC will be providing regular updates on our rulemaking through the GovDelivery(ListServ) application. This application automatically sends updates to those who sign up to receive them, via email or SMS/Text messaging. The link to sign up for OIC GovDelivery updates is [here](https://public.govdelivery.com/accounts/WAOIC/subscriber/new) (<https://public.govdelivery.com/accounts/WAOIC/subscriber/new>). Upon attempting to sign up for these updates, the system will request which updates you would like to receive. For rulemaking updates, please select *OIC Administrative Rules*. This is where the first draft related to the Transparency rules will be published.

The OIC also has a rulemaking website setup for the Transparency rulemaking (R 2022-01). You can visit the Transparency rulemaking website at this [link](https://www.insurance.wa.gov/transparency-insurance-underwriting-r-2022-01) (<https://www.insurance.wa.gov/transparency-insurance-underwriting-r-2022-01>) for regular status updates or additional information on this rulemaking.

Thank you,



Michael Walker

Policy Analyst

Policy and Legislative Affairs Division
Washington State Office of the Insurance Commissioner
360.725.7036 (Office)

Michael.Walker@oic.wa.gov

Protecting Insurance Consumers

www.insurance.wa.gov | twitter.com/WA_OIC | [email/text alerts](#)

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From: VERNON SCHRAG <dwights30@comcast.net>
Sent: Sunday, April 10, 2022 11:57 AM
To: Wolff, Jesse (OIC) <Jesse.Wolff@oic.wa.gov>
Subject: Fwd: Re: LTC CONSUMER INPUT - Transparency in insurance underwriting (R 2022-01)

External Email

Dear Jesse Wolff: Greetings!

Your notice confirming my ZOOM participation was received. Thank you.

My email ZOOM notice indicated that further questions should be sent to you.

Below email to Michael Walker includes some "Interested Parties" discussion items to be included for the R 2022-01 Transparency Meetings.

Robert Solano OIC has access to all my Consumer Complaint/2021-2022 Public Record Files referenced below.

Please include my inputs and requests email below to Rober Walker; and as a WA Resident/Taxpayer and LTC Insurance Policyholder of over 20 years.

Several questions below that I've asked of the Rule Team Members/SMEs should preferably be resolved prior to the Kickoff Session.

*For purposes of Transparency:
Who was informed of these Rules Sessions as Interested Parties?*

More specifically were any WA State Agencies that support Senior Citizens, Aging or Health and Safety? King County? If not, ... Why Not?

*AARP/SCOA/DSHS/BNAC/STATE OMBUDSMAN/AL TSA
ADMINISTRATION?*

Can you help me with these Q's or is Michael Walker the appointed/point-person for such Agenda topics and questions??

Best to you.

Vernon Dwight Schrag

Interested Party - Consumer Protection Issues

Bellevue, WA 98004

425-443-7958

----- Original Message -----

From: VERNON SCHRAG <[dwights30@comcast.net](mailto:dwrights30@comcast.net)>

To: "MichaelW@oic.wa.gov" <MichaelW@oic.wa.gov>

Date: 04/10/2022 11:14 AM

Subject: Re: LTC CONSUMER INPUT - Transparency in insurance underwriting (R 2022-01)

Dear Michael Walker:

Today, 4-10-2022 I've downloaded a Public Record Document for your attention and to the Rule Team Members/SMEs regarding 4/21/2022 Transparency (R 2022-01) Interested Parties. Several questions are included in the Document Download for you to address, now please, if practical.

OIC Complaint Actions Online – Schrag COMPLAINT Reference File # **Cases #1668213 & #1661232**. Thank you.

And, ...At some point, early in your OIC hearings, I ask to be heard on Consumer Input issues covered below & will prepare a POWERPOINT REVIEW to aid our discussions; and/or any questions by Rule Team Members or any other "Interested Parties" for Public Record.

- **LTC Insurance Genworth Policy Holder: Vernon Schrag Facts & Data**
- Eight Years of Public Record Complaints filed with WA OIC regarding GLICRE: Genworth Life Insurance Company (GLIC) Company NAIC No: 70025

- Vernon Schrag's personal testimony of ongoing GLIC Surprise Billings; Elder Abuse; Lack of Meaningful Data; Lack of OIC Commissioner's Actions
- Schrag's receipt of a Formal Letter from GLIC regarding VA Federal Court actions resulting from Class Actions Lawsuit against GLIC w/VA Federal Judge Decision, February 22, 2022
- Schrag's receipt of GLIC memorandums and news releases regarding its recommendation for Chinese Real Estate Company taking over GLIC Insurance Assets; and requests (Disallowed) Federal Agency Approvals
- Schrag's correspondence with Commissioner Kreidler; plus Lt. Governor Heck & Senator Patty Kuderer of State Senate Law & Justice Committee
- Schrag's correspondence with GLIC WA State Sales Agent
- Schrag's correspondence w/DSHS Officials re: Legal Support resources
- Schrag's correspondence w/King County Executive Constantine
- PUBLIC RECORD actions taken on Schrag's behalf on these Vital Matters

Vernon Dwight Schrag

Interested Party - Consumer Protection Issues

Bellevue, WA 98004

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Vernon Dwight Schrag

Interested Party - Consumer Protection Issues

Bellevue, WA 98004

425-443-7958

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Vernon Dwight Schrag

425-443-7958

re: 2021-2022 OIC PUBLIC RECORD COMPLAINT
Reference File Cases #1668213 & #1661232.

POWERPOINT INPUT FILE
Submission to OIC
Policy Analyst Michael Walker
4-12-2022
for (R 2202-01) OIC Hearings

* **WA State Consumer Inputs**

“INTERESTED PARTIES”

WA State Rulemaking & Transparency Policy Information
Vernon Schrag – Senior Citizen Consumer – Bellevue, WA
WA Long Term Care Insurance Policy Holder of 20+ Years

FOR PUBLIC RECORD OIC TRANSPARENCY MTGS

*WA State Consumer Inputs

- ✓ Facts & Data – Schrag Complaint w/LTC Insurance GLIC/Genworth
- ✓ OIC Documents - GLIC LTC “Policy Viability” vs. Consumers Protections
- ✓ Financial Impacts – Schrag LTC Policy – Prior to 2019 Ongoing 2020-2022
- ✓ WA Insurance Commissioner Action/Response (8 years) = NONE/ZERO !
- ✓ Federal Class Action Lawsuit VA Court Judge - February 2022 = \$219 Million
- ✓ GLIC-LTC Policy \$\$ Annual Rate Increase Request to OIC
2021 = ANNUAL @ +82% **2022-2023 @ +113%**

IMPACTS: *Financial Trauma; Policy Loss; GLIC Profits vs Consumer/Policyholders*

*How About My LTC Policy?

What Happens to My Insurance Policy ...if GLIAC Insurance Goes Bankrupt?

Quote: “Insurance is heavily regulated and protected both Federally and by the [State Insurance Commission](#).”

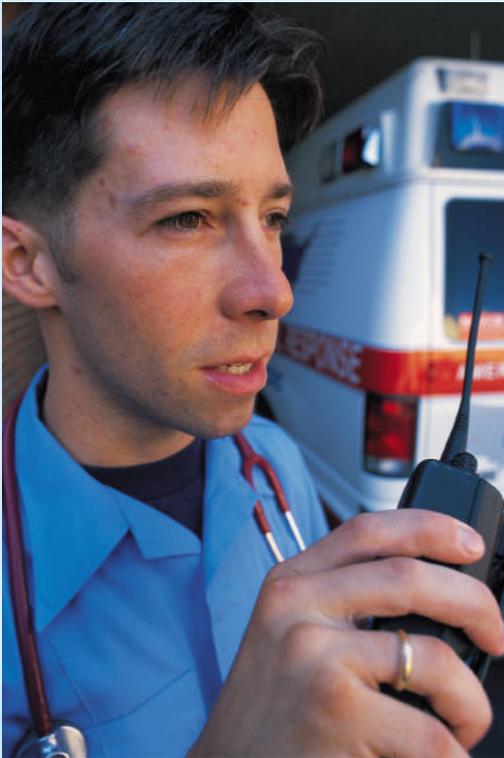
“It is exceptionally rare for any life insurer to go bankrupt and it’s highly unlikely that this will occur with GLIAC Insurance because of its size and overall assets.”

“Even if this did happen, the life insurance coverage will be provided through the [Insurance Guaranty Association that exists in each state](#) which ensures that claims will be paid subject to the State’s Coverage limits. Your insurance claim with Genworth will be honored regardless of what happens,so you can breathe a sigh of relief.”

Source: IBBC Insurance-blog website



*When Ambulance Arrives



- ◆ Investigated & Visited Long Term Care Facilities in Redmond, Bellevue, Kirkland and even Sequim
- ◆ Minimum Advance fees to get Confirmed Opening @ \$20,000 + \$2,000 waiting list
- ◆ Other Options are Up-front Deposit \$400,000 +
- ◆ Additional Monthly & Advance Fees for Couples
- ◆ 96% Occupancy Rate in Bellevue Senior Residence with Nursing Services & Home Care Options
- ◆ At my Age 80 will GLIC succeed in pricing-me-out?
- ◆ **ONLY IF WA OIC FAILS TO ACT FOR CONSUMERS**



* Will OIC Delays Cause WA LTC Consumers to get “Priced Out”??

OIC TRANSPARENCY or NOT?? Time will tell!

Quote from OIC 2020-2021 Review of GLIC LTC Price Increase requests:
..... “to comply with WAC 284-83-090(2)(b), GLIC requests a premium rate increase of 82.8% on the above-mentioned policy forms.”

FOIA WA OIC LTC Policy Document 12-21-2021_82.8% RATE INCREASE Page 40:

Comments: “The magnitude of the proposed rate increase seems likely to represent an unexpected hardship to many of the policyholders, resulting in unanticipated anti-selective shock lapses.”

“In lieu of one large rate increase, please propose two smaller rate increases.” (END QUOTE)



* In Conclusion

SCHRAG'S 2-10-2022 SEMI-ANNUAL PRICE PREMIUM NOTICE ***
FROM GENWORTH - GLIC
@ 30% PRICE INCREASE *** FOR ONE-YEAR

\$3,734.54 is scheduled to take place on or after 03/01/2022.
This will pay semi-annual premiums due 02/01/2022

GLIC 2022 TOTAL ANNUAL LTC POLICY FEE TODAY = \$ 7,469.08/year

GLIC PROPOSED 2023 PREMIUM INCREASE @ 113% = \$15,909 Premium/yr

Equivalent to Six (6X) times Monthly Social Security \$\$ Income Now

From: [VERNON SCHRAG](#)
To: [Walker, Michael \(OIC\)](#)
Subject: Schrag Examples of GLIC LTC Lack of Transparency in WA State Business Practices
Date: Wednesday, April 13, 2022 8:20:06 AM
Attachments: [WA OIC CR-101 Comments File \(R 2022-01\).pdf](#)

External Email

Dear Michael Walker: Good morning!

Please add the attached pdf file Powerpoint Slide #6 Elder Abuse topics/facts to your records file for future reviews of Schrag Complaints w/OIC Officials.

Elder Abuse has been a pervasive & unethical theme for avoiding Customer Questions by GLIC LTC Agents & Officials over the years. ... Specifically lack of transparency, false claims about "we didn't know" or "send me a copy"??

How can a WA State LTC Policy Customer conceivably be expected (???) to make informed financial and legal decisions about managing their own policy pricing and legal change of LTC provisions without information? Total confusion.

A biggest concern is that OIC Commissioner has been aware for over 8 years now of these very same issues. Where are Consumer Protections in WA State? Who takes action to help Seniors dealing with Elder Abuse, Falsehoods and LTC Schemes by Insurance providers, specifically GLIC?? Who should we contact for help on these vital and essential matters? Where to start?

WA OIC appears to also be "in the dark" as we've experienced in our Official Complaint steps with OIC Consumer Advocates; OIC Public Affairs; OIC Analysts; and the Commissioner's Offices.

Pass it on please. A high-level OIC Legal Review step is in order.

Thank you. FOR PUBLIC RECORD

Sincerely,
Vernon Dwight Schrag
WA Interested Party - Insurance Transparency Hearings
Bellevue, WA
425-443-7958

From: [VERNON SCHRAG](#)
To: [Walker, Michael \(OIC\)](#)
Subject: Transparency Followup Fwd: Automatic reply: Senior Abuse Practices by LTC Insurance Company in WA State
Date: Friday, April 15, 2022 9:56:48 AM
Attachments: [OIC-NAMIC- OIC LTR 2019 -cr-102-r-2018-09.pdf](#)
[WA OIC CR-101 Decision-Time Comments \(R 2022-01\).pdf](#)

External Email

Dear Policy Analyst Walker:
FOR PUBLIC RECORD

I've been reaching out to Bellevue & Kirkland City Government Officials who coordinate BNOA and Kirkland Senior Council; and that communicate together with Senator Kuderer of Law & Justice Committee. Also to King County Ombudsman's Offices in Federal Way.

BELLEVUE'S BNOA MISSION: "The BNOA is dedicated to healthy aging in our community by promoting awareness of needs and resources that support older adults through life's transitions. Abigail Brown has been voted in as the **BNOA Chair and Janet Jelleff has been voted in as Vice-Chair for the year 2022.**"

I believe that **NAMIC Lobbyists have greatly overstepped their boundaries,** lacking transparency and questionable ethics and/or false claims regarding Policyholders in their attempts to influence and block any OIC progress with LTC Consumer Protections.

See attached Public Record NAMIC claims made in letter to OIC Rules Coordinator, August 2019.

Pass it on to Robert Solano please.

Some essential and necessary investigations, actions, information gathering and reviews of Schrag OIC Complaint files **can certainly move ahead in Parallel w/Transparency** Hearings ZOOM Sessions starting next week.

No need to wait for months to take Actions that will greatly aid in determining Best-Practice Consumer Protections for WA LTC Policyholders of GLIC Genworth 2022-2023 Price-Increase Submittals to OIC.

And it would be worthwhile to look into APCIA' Stated Public/Lobbyist Priorities for CY 2022.

I'd greatly appreciate an opportunity to speak w/Commissioner Kriedler about "Steps & Actions" for resolving these matters. Private by ZOOM is okay. Who can arrange?

Comments for PUBLIC RECORD were downloaded today into Schrag OIC Complaint Files/4-15-2022.

See attached Ppt Page "Decision Time June 2202" for Public Record. Thank You!

Sincerely, Vernon Dwight Schrag
Interested Party - Transparency Meetings
Bellevue, WA 98004
425-443-7958

----- Original Message -----

From: "Lassiter, Dan" <DLassiter@bellevuewa.gov>

To: VERNON SCHRAG <dwights30@comcast.net>

Date: 04/14/2022 9:38 AM

Subject: Automatic reply: Senior Abuse Practices by LTC Insurance Company in WA State

I am away from work, Please call NBCC 425 452- with emergent needs.

Dan



August 27, 2019

Office of the Insurance Commissioner
5000 Capitol Blvd., SE
Tumwater, WA 98501

Vernon Dwight Schrag FOIA Action Reviews 4-15-2022

317.875.5250 | [F] 317.879.8408
3601 Vincennes Road, Indianapolis, Indiana 46268

202.628.1558 | [F] 202.628.1601
20 F Street N.W., Suite 510 | Washington, D.C. 20001

**To OIC-Rules
Coordinator
August 27, 2019**



Delivered via electronic submission: rulescoordinator@oic.wa.gov.

RE: Adverse Notifications (R 2018-09) – NAMIC’s Written Testimony

The National Association of Mutual Insurance Companies (NAMIC) is the largest property and casualty insurance trade association in the country, with more than 1,400 member companies. NAMIC supports regional and local mutual insurance companies on main streets across America and many of the country’s largest national insurers. NAMIC members represent 40 percent of the total property/casualty insurance market, serve more than 170 million policyholders, and write nearly \$225 billion in annual premiums. NAMIC has 138 members who write property/casualty policies in the State of Washington, which represents 48% of the insurance marketplace.

Thank you for providing NAMIC with an opportunity to submit written comments on the above captioned proposed regulation. NAMIC appreciates all of the time and effort the Office of the Insurance Commissioner (OIC) has invested into stakeholder discussions on this regulatory project. NAMIC commends the OIC for making several changes to the draft regulation requested by the insurance industry. Specifically, we appreciate the OIC’s decision to redraft Section (2)(b) of the proposed regulation to revise the provision relating to “initial” claims so that it only applies to “final” claims payments, its clarification that Section (2)(c) of the proposed regulation applies to only health insurance; and the OIC’s addition of the qualifier in Section (2)(d) that the notice requirement does not apply to cancellations due to nonpayment of premium. However, NAMIC is still quite concerned about the legal, regulatory and public policy implications of a number of key provisions in the proposed regulation. In the spirit of cooperation, NAMIC respectfully tenders the following comments.

1. THE PROPOSED REGULATION IS LIKELY TO DELAY THE TIMELY SETTLEMENT OF CLAIMS

NAMIC is concerned that the proposed regulation will result in the OIC unnecessarily intervening into the claims adjusting and settlement process during the pendency of a claim, which could delay claims resolutions. Additionally, we are concerned that the proposed consumer notice about contacting the OIC will lead consumers to start sending claims information and documentation that should be submitted directly to the insurer to the OIC instead, thereby creating communications problems between the insurer and the consumer. Current law already provides consumers with the ability to secure the timely assistance of the OIC with a claim dispute. Insurers have 15 working days to respond to inquiries from the commissioner concerning a complaint under WAC 284-30-360. Steering consumers to the OIC’s complaint process when there is no actual controversy will only slow down the claims process by adding an unnecessary and time-consuming bureaucratic protocol to the claims process.

“No Controversy” - What Constitutes??

We are also concerned that the proposed consumer notice could adversely impact the OIC’s ability to be responsive to meritorious consumer complaints. Interjecting the OIC into “run of the mill” claims adjusting and settlement activities will require the OIC to expend its limited resources responding to baseless consumer complaints related to claims that are being handled appropriately and consistently with the insuring agreement and insurance code by insurers merely because the consumer has raised a statement of general dissatisfaction with the outcome of their claim. OIC staff resources are best used to investigate and resolve legitimate consumer complaints.



2. THE PROPOSED REGULATION EXCEEDS THE SCOPE AND INTENT OF CURRENT ADVERSE ACTION NOTICE STATUTES THAT APPLY ONLY TO UNDERWRITING

Current law requires insurers to provide "adverse action" notices in *only* two instances:

- (1) RCW 48.30.320 - Upon cancelling, denying, or refusing to renew a policy, an insurer shall “upon written request” directly notify the applicant or insured of the reasons for the action by the insurer.
- (2) RCW 48.18.545(2) - If the insurer takes “adverse action” based in whole or in part on credit history. This notice only requires the insurer to list the significant factors of the credit history or insurance score and state that the insurer may obtain a copy of the credit report.

The current law applies the “adverse action notice” requirement to adverse underwriting decisions, which is the way “adverse action notice” laws are written throughout the country. The proposed regulation would significantly and improperly expand the scope of the law to apply it to claims practices on:

- (1) Claim denials;
- (2) Final claims payment for less than the original amount of the claim submitted

NAMIC is concerned that the OIC is proposing to improperly expand, via regulation not state legislation, the definition of an “adverse action” to include claims activities. First, this is unnecessary, because there is already a detailed law in place that addresses claims settlement practices. WAC 284-30-330. Second, the “adverse action” legal concept was never intended nor designed to address claims determinations. The “adverse action notice” was originally created to address consumer inquiries pertaining to insurer use of Credit-Based Insurance Scores. Third, the proposed regulation creates a presumption that the amount of the original settlement demand is the metric for determining whether there was an adverse action by the insurer. For example, if an insurance consumer has a claim with nominal damages, but asserts a clearly unreasonable high settlement demand, the insurer would be required to treat their settlement decision to pay less than the unreasonable settlement demand as an adverse action by the insurer. NAMIC is concerned about the public policy implications and legal ramification of a final settlement that is less than the original settlement demand, which is typically inflated by plaintiff attorneys as part of standard claims negotiations, being labeled “an adverse action” by this regulation.

3. THE PROPOSED REGULATION IS UNNECESSARY, AND LIKELY TO CREATE CONSUMER CONFUSION

To date, the OIC has not provided any evidence to support the contention that the proposed regulation is necessary for the OIC to assist consumers in their professional relationship with their insurer. Requiring insurers to post the proposed consumer notice on a vast array of different insurer-consumer communications is likely to confuse consumers into believing that they need to involve the OIC in routine aspects of the insurance relationship. There is no evidence to support the belief that consumers involved in a dispute with their insurer are unaware of the regulatory assistance available to them from the OIC. This regulatory proposal is likely to confuse consumers about where they should direct their basic coverage and claims inquiries, which could result in claims adjusting delays and needlessly interfere with insurers’ ability to provide timely services to their consumers.



4. THE PROPOSED REGULATION WILL CREATE NEEDLESS ADMINISTRATIVE BURDENS AND REGULATORY CHALLENGES FOR THE OIC AND INSURERS

The proposed regulation requires insurers to state in a number of standard claims adjusting communications that, “[I]f you have questions about your coverage or would like to file a complaint regarding your insurance company or agent, contact the Washington state Office of the Insurance Commissioner’s consumer protection hotline at 1-800-562-6900 or visit www.insurance.wa.gov...”

The likely practical implication of this notice is that any consumer who doesn’t get the exact amount of their initial settlement demand, even if the settlement demand is entirely unreasonable, inconsistent with the facts of the situation, and contrary to law on point, are being encouraged to file an illegitimate complaint against the insurer with the OIC. Not only will this lead to an inefficient use of the OIC’s limited resources, but it will also lead to confusion over what is a justified or legitimate consumer complaint and what is an unfounded or illegitimate consumer complaint. This churning of consumer complaints could lead to unnecessary and unproductive conflict between the regulator and insurers; and it could be easily manipulated by plaintiff attorneys to coerce insurers into accepting unreasonably inflated settlement demands that adversely impact affordability of insurance for consumers.

5. THE PROPOSED REGULATION WOULD EFFECTUATE A SIGNIFICANT CHANGE TO THE UNFAIR CLAIMS SETTLEMENT REGULATION

NAMIC is concerned that the OIC’s regulatory proposal would in effect alter the unfair claims settlement regulation under RCW 48.30.015(f). Specifically, the addition of *underwriting actions* within the proposed regulation on *claims settlements* governed by WAC 284-30-770(2)(d) seems conceptually and organizationally inappropriate.

Additionally, the proposed regulation is not supported by any evidence that there is a specific regulatory problem that requires including the stated acts and practices as being unfair or deceptive as provided in RCW 48.30.010(3). NAMIC is concerned that the proposed regulation is based upon a logical construct that is unfounded. Specifically, a claim denial or payment for less than the amount of the asserted claim is not an inherently unfair or deceptive business practice. Insurers are required to comply with the terms of the insuring agreement and the insurance code, so if the insurer’s denial of a claim or payment of less than the amount asserted by the claimant is in compliance with the contract and insurance code the insurer’s actions are neither unfair nor deceptive. Further, a rescission, cancellation, termination or non-renewal of an insurance policy, in and of itself, is not an inherently unfair business practice unless the action is undertaken in violation of the terms of the insuring agreement or some provision of the insurance code. Additionally, the language of the proposed regulation could arguably be interpreted to also apply to “partial” denials of a claim, which would mean that whenever an insurer makes *any* adjustment to the specifics of the claim submitted by the policyholder an insurer would be required to treat it as an adverse action. The proposed regulation would require insurers to treat these reasonable, appropriate and lawful activities as pejorative “adverse actions” when they are merely standard contract-based, or otherwise legal, actions essential to the insurance relationship.

6. THE PROPOSED NOTICE IS TOO BROAD AND SUGGESTIVE **“Free Speech??”**

The OIC’s complaint “solicitation” language - “If you have questions about your coverage or would like to file a complaint regarding your insurance company or agent”, is too broad and too suggestive. The language appears to solicit and/or encourage the filing of complaints.

NAMIC is also concerned that the proposed information required on the “adverse notification” is overly prescriptive and could be perceived as public relations outreach by the OIC. From a commercial free speech standpoint, insurers should not be required to state in their private communications with their policyholders that “[t]he insurance commissioner



protects insurance consumers, the public interest, and provides the fair and efficient regulation of the insurance industry.” A private business should not be required to advertise the professional services of a state agency. The OIC has a long history of prolific and effective public relations activities and consumer educational outreach. Thus, insurers should only be required to state the OIC’s basic contact information.

For these reasons, NAMIC respectfully requests that the OIC withdraw this proposed regulation and discuss with insurers less contentious and more cost-effective ways to educate consumers about the wealth of services available to them through the OIC.

Thank you for your time and consideration. Please feel free to contact me at 303.907.0587 or at crataj@namic.org, if you would like to discuss NAMIC’s written testimony.

Respectfully,

Did OIC Discuss Lobbyist Position by Rataj ???

Christian John Rataj, Esq.
NAMIC Senior Regional Vice President
State Government Affairs, Western Region



* Decision Time: June 2022

- ◆ WA OIC to Inform GLIC Policyholders – “Steps & Actions”
... (or Say “NONE”)
- ◆ Evaluate Schrag LTC Policy Options 2022-2023 Pricing Letter & Deadline Date from GLIC (Inform Schrag of OIC Position)
- ◆ Assess/Discuss & Review w/State Agencies & Regulators
- ◆ Compare w/Findings of VA Federal Court Class Action Lawsuit 2022
eg. “Specific Requirements” GLIC Letter to Policyholders/Schrag
- ◆ Evaluate Industry Practices & “Potential Bankruptcy” Experts
- ◆ Review & Collaborate w/Consumer Protection Agencies/Lobbyists
- ◆ Review Findings w/DSHS-ALTSA, BNOA, Kirkland Council on Aging, SCOA in Public Forums w/”Transparency” Considerations

From: [VERNON SCHRAG](#)
To: [Walker, Michael \(OIC\)](#)
Subject: OIC Transparency Hearings April 21, 2022
Date: Saturday, April 16, 2022 10:55:50 AM
Attachments: [WA OIC CR-101 Bottom Line Comments \(R 2022-01\).pdf](#)
[WA June 2022 - BNOA Elder Abuse Month Bellevue WA Newsletter.pdf](#)

External Email

Dear Michael Walker:

Although Schrag' Powerpoint materials are not open for ZOOM discussion next week, they are now complete and available to OIC Officials at whatever is best/appropriate time. Our final PPT page (out of 10) is attached. You are now in possession of the entire package for Transparency Discussions along with hundreds of pages submitted during 2014 to 2022 for OIC Complaint Submittals.

Of course you might be aware that many other documents are also available that have not yet been submitted. Plus, June 2022 is WA official "Elder Abuse Awareness Month" for BNOA Members and other Senior Citizen Protection Groups across our State (attached pdf file).

OIC COMPLAINT FILING # 1668213 Attached Ppt Page 10 "**Bottom Line**" transparency topics downloaded this morning. **Pass it along to Robert Solano please. Thank you.**

Sincerely,
Vernon Dwight Schrag
WA Interested Party - OIC Insurance Transparency Hearings
Bellevue, WA 98004
FOR PUBLIC RECORD

And text below also downloaded for OIC Complaint Records:

Apr. 16, 2022: Quote: Vernon Dwight Schrag: FOR PUBLIC RECORD - UPLOAD FILES: See Policyholder Transparency Concerns regarding finger pointing and passing the buck between WA State Public Agencies. This kind of highly questionable behavior is sure to raise concerns w/WA State Legislature and others like DSHS Officials.

Such actions reflect poorly on OIC and should be fully discussed at highest levels. Schrag Powerpoint Transparency Briefing File for Public Hearings is now complete and available to discuss w/OIC Kreidler. Only 10 pages, but a starting-point summary of Schrag's 8-years of efforts to affect change. This information will also be shared and discussed in other Public Forums w/Citizen Groups and Advocates and Ombudsman for protections against Elder Abuse in WA State.

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Vernon Dwight Schrag
WA Interested Party - OIC Insurance Transparency Hearings
Bellevue, WA 98004
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Eight years is a long time to find solutions for GLIC LTC' behaviors, lack of ethics, surprise Billings and discounting Senior Citizens of WA who hold LTC Policies. Any other business would have been removed from ability to sell products in WA State. But NAMIC and other Lobbyists appear to have the upper hand w/OIC?

Can we end that now? WA State Legislature & Governor Inslee MUST

receive OIC & Consumer facts and data so they will take steps to enforce WA Commerce Laws and defend WA State LTC Consumers.

Schrag will present these Powerpoint materials for the WA Law and Justice Committee & DSHS consideration via Zoom or during Legislative Session if given opportunity for full disclosure and transparency regarding GLIC Practices in WA State. FOR PUBLIC RECORD 4-16-2022 Vernon Dwight Schrag

OIC COMPLAINT FILING # 1668213 (end quote)



* Bottom Line

8 -Years Finger-pointing & Passing-the-Buck

- ❑ Everyone blaming other Agencies & Leaders of WA State Government
- ❑ “Our Legislature won’t act... ?? to protect Consumers” (OIC)
- ❑ “Legislature can’t put demands on Kriedler to do more” (Senate Aide)
- ❑ “We can’t do anything... “A Judge will rule against us!” (OIC)
- ❑ “If you have any good ideas on Rules Change, let us know” (OIC)
- ❑ (Laughing & Giggling) ... It’s a “Circular-Firing-Squad” Hah Hah! (OIC)
- ❑ “Kriedler is following whatever actions
...that other States are doing” (OIC)



“Disgusting”
Garbage Talk

NEP Project Spotlight:

Cherry Crest Elementary Intersection Improvements

Completed during the Summer of 2020, the resident-initiated Cherry Crest Elementary intersection improvement project enhanced the three-leg intersection at the entrance to Cherry Crest Elementary School.



The project ended stop compliance and provides a safer pedestrian crossing condition for students and parents. The project included the installation of a new streetlight on the southwest corner of 124th Avenue Northeast and Northeast 32nd Street, the replacement of existing STOP signs with flashing STOP signs to enhance visibility and fun, crayon-themed crosswalk paint was added inside of the existing north-south crosswalk. Thanks to Transportation department project managers Jeremy Chin and Max Scheideman for their work to bring this project to the Bridle Trails community.

Openings on Youth Link Board

Bellevue Youth Link is seeking seven high-school aged candidates and two adult Bellevue residents for vacancies on its volunteer board. Applications are due by 5 p.m., Monday, June 14.

Board members serve two-year terms, attending two meetings in various community locations each month. The City Council formed the Youth Link Board in 1991 to advise the council and city manager on issues facing Bellevue's youth. The City of Bellevue values diversity and encourages anyone interested to apply. People interested in serving on the board may apply directly online: bit.ly/3fCLMSz

For additional information about the Youth Link Board, please contact Patrick Alina, Youth Link coordinator at 425-452-5254 or palina@bellevuewa.gov.



MONTHLY BELLEVUE, WA NEIGHBORHOOD NEWS RELEASE

June is "Adult Abuse Awareness Month"

The Bellevue Network on Aging would like to share information on elder and vulnerable adult abuse. Washington state designates June



as Adult Abuse Awareness Month. Our state uses the term "adult abuse" rather than "elder abuse" in that our state investigates all reports of vulnerable adult abuse. However, most vulnerable adult reports involve seniors. In 2020, of the 65,106 adult abuse reports received by Adult Protective Services (APS), at least 76% involved persons aged 60 and older.

What is Adult Abuse?

"Adult abuse" describes a range of behavior including financial exploitation, physical abuse, mental abuse, neglect, personal exploitation, self-neglect and sexual abuse. Adult abuse can occur in homes, institutional settings such as nursing homes or assisted living facilities, and within businesses in the community. Adult abuse is often perpetrated by a known, trusted person, for instance an adult child, grandchild, or spouse. The National Council on Aging reports that "Two thirds of perpetrators are adult children or spouses."

ncoa.org/article/get-the-facts-on-elder-abuse

Signs of Abuse

There are multiple signs of vulnerable adult abuse, including lack of food or medicine, bills not paid, unusual purchases, bruises, black eyes and welts, sudden or unexplained changes in behavior, harassment and humiliation, withdrawal from social interactions and panic attacks. Unfortunately, adult abuse is underreported. A victim may not report abuse for varied reasons, including inability to report,

From: [VERNON SCHRAG](#)
To: [Walker, Michael \(OIC\)](#)
Subject: Re: OIC Transparency Hearings April 21, 2022
Date: Monday, April 18, 2022 8:54:43 AM

External Email

Dear Michael Walker:

Please pass this info along to Robert Solano for his use in assessing our ONGOING Complaint Filings. Thank You.

FYI - We DID find State Legislative Records (2019) that shows WA Commerce Dept has begun reviews and recognizes LTC Policy/Rules Actions are needed in WA State. Today 4/19/2022 we added more documents and Public Record Complaint Statements for Solano's review:

"OIC COMPLAINT # 1668213: We made direct inquiry to WA Commerce Dept, Devin Proctor, who has been directly involved with Legislation regarding Long Term Care Rules and Policy.

Provided Mr. Proctor with 2016 and 2018 OIC Complaints w/reference documents; and Rules Transparency Hearings upcoming this week.

Sent copy of Schrag Letter request to OIC Public Affairs on April 4, 2022 for which NO RESPONSE whatsoever has been received.

See attached upload files that illustrate in detail how GLIC has manipulated WA State OIC as well as its WA LTC Policyholders in attempts to extract premiums at exorbitant levels on an Annual Basis/ongoing 2022-2023. FOR PUBLIC RECORD Vernon Dwight Schrag"

Solano suggested that we inquire of WA OIC Public Affairs but that step proved fruitless so far? Now what? If Transparency via OIC Public Affairs is not a valid step, very few options are left for WA State LTC Policyholders of GLIC/Genworth; and worthy of some in-depth reviews.

Sincerely,
Vernon Dwight Schrag
WA Interested Party - OIC Insurance Transparency Hearings
Bellevue, WA 98004
FOR PUBLIC RECORD

On 04/16/2022 10:55 AM VERNON SCHRAG <[dwights30@comcast.net](mailto:dwrights30@comcast.net)> wrote:

From: [VERNON_SCHRAG](#)
To: [Walker, Michael \(OIC\)](#)
Cc: [Wolff, Jesse \(OIC\)](#)
Subject: Attn: Interested Party Comments - Today's ZOOM OIC - Insurance Underwriting R 2201 Initial Meeting 4-21-2022
Date: Thursday, April 21, 2022 10:17:58 AM

External Email

Dear Michael Walker: Good Morning!

Attempted to "Raise My Hand" several times this morning but no icon ever showed up.

Maybe just a software glitch? ... But thanks for asking. Listen and Learn. ... At least I tried.

THREE items for later discussions and to include in R 2201 FORMAL RECORD FILES FOR PUBLIC RECORD:

1 - Long Term Care was not specifically included in scope? This particular type of Insurance impacts every WA Resident & Family. Therefore, as a Consumer/Interested Party I recommend Inclusion into Records for these R 2201 Transparency Hearings Agenda & OIC Rulemaking Processes.

Note: Robert Solano OIC has access to all my Consumer Complaint/2021-2022 Public Record Files & prior since 2014.

2 - Vernon Schrag Powerpoint-Briefing-File is Ready to Go as of today/4-21-2022. Maybe 20 minutes discussion/questions. And I strongly recommend OIC provides it now (Full Ppt Document File) to Lobbyist Groups like APCIA and NAMIC to enable them to respond and ask direct questions to LTC Consumer "Interested Parties" such as myself.

These particular Lobbyist participants may not yet comprehend Transparency-Failures w/ surprise billing issues for WA State residents and Policyholders. Knowledge is good. They can listen and learn.

3 - For OIC's Staff and Legal Members participating, I offer my time, knowledge and Consumer Advocacy experience to help OIC succeed in future long-term protections for WA residents and Seniors.

Phone calls or meeting to clarify and assess issues of fraud, lack of transparency in LTC matters, etc etc. Just ask questions and I'll be truthful and honest in my inputs. Willing to go "Under Oath" if need be; and I would welcome OIC' questions.

Please enter this entire e-mail communication into your OIC Underwriting Interested-Party Comment Records please. Pass it on. Thank you.

Vernon Dwight Schrag
LTC Insurance Consumer & Interested Party
425-443-7958
email: [dwights30@comcast.net](mailto:dwrights30@comcast.net)

From: [VERNON SCHRAG](#)
To: [Walker, Michael \(OIC\)](#)
Cc: [Wolff, Jesse \(OIC\)](#)
Subject: ZOOM SESSION HEARING COMMENTS Fwd: LTC CONSUMER INPUT - Transparency in insurance underwriting (R 2022-01)
Date: Thursday, April 21, 2022 11:57:50 AM

External Email

Dear Michael Walker: I add this email to your team's **"Interested Party Comments" to be entered into the record. Confirmation requested.**

I believe this information can/should be immediately shared with those Lobbyists who raised their hands today during OIC's initial ZOOM Kickoff Session.

It may be a controversial issue for WA Consumers to speak up for their own interests, ... BUT maybe not? We'll see. See Records submitted per Lobbyists below (quote):

OIC PowerPoint Page 16 **Comments – Received for CR- 101**

Three Comments Submitted –

1. **CAMBIA** – communicated **concerns with the scope of rule** including health and disability insurers.
2. **APCIA**– contends the rules will provide significant amounts of public information to consumers, but will **not actually best serve** the consumers; explains the **notice does not cite any real need on data**, such as **complaints to the OIC**; **raises multiple legal issues**; suggests impracticability/impossibility of **regulations; communicates a lack of clarity; proposes regulatory authority** is sufficient without new rules; **references legal limits**; and offers examples and information on **better methods to achieve transparency goals**.
3. **NAMIC**– explains **P&C insurers provide transparent information to consumers**; cites existing authorities; **contends adverse action notices are sufficient**; argues positive impacts with **adverse actions is confusing to consumers**; states **responsibility is for OIC and not consumers to regulate** insurers; references limits in the **Uniform Trade Secrets Act**;

From my well-informed Consumers Advocacy experiences over 20 years; and a WA Consumer's LTC policyholders 23 years perspective; and with SO MUCH facts and data available to OIC Commissioner Kriedler, these "Comments" above seem part of the problem; and NOT any Solution. Roadblocks, ... not progress. **Not a "Best Practice" to set up needless Roadblocks before you ever start.**

Legal issues noted by APCIA are most concerning at the outset without any specifics. Are we already heading into some kind of "Court Battle"? Even before we begin

discussions? And NAMIC comments made about OIC versus consumers regulating insurers? What is that?

Can we get all this into the Public Domain for benefit of Legislators, DSHS, Consumers Advocacy Groups and WA Governor please?

Please PASS IT ALONG; and enter these records (including 04/09/2022 email below) into today's OIC Record File Interested Party Comments. Thank you.

Sincerely,
Best regards,
Vernon Dwight Schrag
Interested Party LTC Consumer
425-443-7958

re: 2021-2022 OIC PUBLIC RECORD COMPLAINT Reference File Cases #1668213 & #1661232.

----- Original Message -----

From: VERNON SCHRAG <dwights30@comcast.net>

To: "MichaelW@oic.wa.gov" <MichaelW@oic.wa.gov>

Date: 04/09/2022 12:29 PM

Subject: LTC CONSUMER INPUT - Transparency in insurance underwriting (R 2022-01)

Dear Policy Analyst Walker:

As a Consumer and interested party of my wife's and my own Long Term Care Policy of over 20 years, I reviewed Powerpoint files & Agenda Topics for your April 21st Zoom Meeting.

Also, we noted the "CR-101 COMMENTS" push-back OIC already received from CAMBIA; APCIA & NAMIC. These groups do not seem to have a grasp of real and financially harmful practices or impacts on Seniors of recent pricing practices for LTC policies. Rule-making is long overdue for consumer protections.

Please ask these organizations/lobbyists to review Consumer inputs for 2021 & 2022 Consumer Issues with the current lack of Rules in WA OIC procedures for ethical and professional analyses of **Annual LTC Rate Approvals pricing requested over 82% in 2021; and another 113% Price/Rate Increase for 2022-2023.**

From 8+ years of our ongoing PUBLIC RECORD Complaint File submittals, we explained why there's vital need to fix the mess with OIC Approval rules/policies; public data; WA State government data-

transparency and Insurance Policy transparency & disclosures re:

OIC Complaint Actions Online – Schrag COMPLAINT Reference File # **Cases #1668213 & #1661232.**

OIC Robert Solano is aware of both complaint files and today I provided a request to provide the entire file content for your Rule Team Members to consider.

Yesterday we requested that DSHS provide our information via FAX to OIC for a more in-depth and careful review. Other WA Agencies should also assess these matters. Everyone seems to be "pointing the finger" at each other?? Now what?

I'm available and willingly volunteer to provide you and entire OIC team my informed WA "Consumer Based Input" plus powerpoint file to clarify and simplify these complex rules into simple, concise and transparent terms to help Commissioner Kreidler and Governor Inslee understand urgent actions needed for Consumer Protections.

Long Term Care Insurance is front and center as our current Legislature knows so well.

Way back on March 5, 2014 I received a response letter from Jim Keogh, OIC Policy and Rules Manager, to proposed LTC Rule making for extensive WA LTC premium recommendations.

Jim Keogh Quote: ... *"The Commissioner, as a member of the National Association of Insurance Commissioners, is continuing to follow this issue along with other state insurance commissioners in order to find solutions which will minimize premium increases while ensuring the continued financial viability of long-term care insurance plans. If you have any specific recommendations with regard to changes that could be made in the Washington Administrative Code he would appreciate those."*

Please ask the Commissioner what has been done regarding these matters in the past 8 years. Maybe your Committee can resolve these issues for benefit of Consumers instead of only for Insurance' Corporate interests? Whose financial viability is most at risk?

Take a close look at today's download file for Vernon Schrag - OIC Complaints. It seem very clear where the risk is focused in reviewing FOIA OIC document files.

Even better idea may be (also) querying Interested Party members of CAMBIA, APCIA & NAMIC since their initial comments don't support or offer real solutions for essential/vital OIC-Rulemaking actions? Why is that?

Thank you for considerations.

Please pass it on for your Committee's kickoff membership orientation. And also add refer these specific email Consumer Focused Comments to CR-101 Interested Party Agenda topics.

Best regards,
Vernon Dwight Schrag
425-443-7958

re: 2021-2022 OIC PUBLIC RECORD COMPLAINT Reference File **Cases #1668213 & #1661232.**

From: [VERNON SCHRAG](#)
To: [Walker, Michael \(OIC\)](#)
Cc: [Wolff, Jesse \(OIC\)](#); [Akita, Cameron \(DSHS/AL TSA/HCS\)](#)
Subject: REQUEST: Interested Party Comments - Today's ZOOM OIC - Insurance Underwriting R 2201 Initial Meeting 4-21-2022
Date: Thursday, April 21, 2022 2:49:15 PM

External Email

Dear Michael Walker: See Request for R 2201 OIC Teams' in-depth discussions w/LTC Consumers and WA Consumer Advocates/Agencies.

Consumer Protection issues will be "eye-opener's" for everyone to discuss and seek Rules & Transparency Actions for WA Policyholders.

Please add Inputs Below for today's Consumer Comments; and in particular OIC's Assessments re: 50-State GLIC-LTC Class Action Lawsuit Records - Virginia Federal Court Judge Ruling February 2022. WA Policyholders received a "Decision-Dated Packet" via USPS GLIC Mailer.

Important Review Topics for OIC Legal Staff to Assess re: Transparency & Future Policy Actions:

A - For R 2201 Hearings, Vernon Schrag requests to present GLIC Policy Price Increase "WA Notification Letters" to OIC Review Team

Mailings to Schrag's as GLIC LTC Policy Declaration Terms Dated 11-26-2021 & GLIC Deadline Decision-Date by 02/01/2022

B - For R 2201 Hearings, Vernon Schrag requests to present GLIC LTC Regulatory History related to Federal Class Action Lawsuit Filings

C - For R 2201 Hearings, Vernon Schrag requests to present details of LTC Insurance Practices in WA State by GLIC

D - For R 2201 Hearings, Vernon Schrag requests open discussions to examine A - C Facts w/OIC Review Team & Interested Parties

If such Transparency-related considerations as noted above are "Outside of Scope" then WA OIC is requested to immediately notify Schrag's so they may pursue other avenues in seeking Consumer Protections in WA State; and in particular w/DSHS or other State Agencies.

Thank you for including these comments for today's Hearings Topics.

Best to you & your entire OIC Transparency Team. You are all doing important work

in a complex arena of Lobbyists and Legislators.

Please enter this entire e-mail communication into your OIC Underwriting Interested-Party Comment Records please. Pass it on.

Warm regards,

Vernon Dwight Schrag
LTC Insurance Consumer & Interested Party
425-443-7958
email: dwights30@comcast.net

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