

Action Together NEPA  
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February 27, 2026

Mr. Michael Humphreys, Commissioner  
c/o: [kimsheaffe@pa.gov](mailto:kimsheaffe@pa.gov)  
Pennsylvania Insurance Department  
1326 Strawberry Square  
Harrisburg, PA 17120  
RE: Risant-Geisinger Modification Request

Dear Commissioner Humphreys,

Action Together NEPA is submitting the following public comment in response to the Risant application request for modification of the Pennsylvania Insurance Department's order number ID-RC-24-03-01.

Action Together NEPA is a progressive grassroots advocacy organization located in northeastern Pennsylvania, representing over eight hundred members and employing fourteen full-time and part-time employees. For many of our members and several of our staff, Geisinger Health System (Risant) is the provider that they rely on for medical care or insurance coverage.

Geisinger argues in its request for modification that lowering risk based capital (RBC) requirements for its insurance plans will safeguard healthcare access and quality of care in the rural communities it serves; yet they note several times in the application that such a modification would support planned facilities expansion at its Danville main campus and Geisinger Wyoming Valley locations.

We believe that quality of care cannot be provided to the public if insurance coverage is unaffordable. In the fall of 2025, Geisinger asked the Department to approve substantial [premium rate increases for both its Geisinger Health Plan and Geisinger Quality Options plans](#), citing rising costs and federal cuts to programs like Medical Assistance and SNAP.<sup>1</sup> If the rise in the cost of healthcare necessitated significant increases in premiums for fiscal year 2026-27, then we do not believe that it is prudent to lower RBC requirements to support facility expansions.

All across our Commonwealth and northeastern Pennsylvania, Pennsylvanians are grappling with the rising cost of healthcare, groceries, and utilities. Meanwhile the cuts to Medical

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<sup>1</sup> Sandino, Diego. "Pennsylvania Insurance Department Releases Affordable Care Act 2026 Health Insurance Rates." PA Insurance Department, October 14, 2025. <https://www.pa.gov/agencies/insurance/newsroom/aca-2026-health-insurance-rates>.

Assistance, included in H.R.1, are projected to lead to [310,000 Pennsylvanians losing coverage](#).<sup>2</sup> During a Wednesday appropriations hearing, officials for [Pennie reported that more than 104,000 Pennsylvanians](#) have discontinued their ACA plan coverage, and many more will undoubtedly transition to plans with higher out-of-pocket costs and fewer benefits.<sup>3</sup> Risant's own request for modification acknowledges these financial risks and the potential threat posed by a rise in the cost of uncompensated care, so current market forces and political circumstances appear to undercut their justification for approval of this modification request.

We would ask the Department to deny this request, or predicate approval on a requirement that Geisinger (Risant) work toward reducing or freezing healthcare costs for northeastern Pennsylvania consumers in the coming years.

Residents in northeastern Pennsylvania have watched as Geisinger has progressively expanded— buying smaller hospitals and merging with Kaiser Permanente, one of the largest integrated providers and insurers in the country. Geisinger has been the subject of at least three antitrust investigations, and a [U.S. Department of Justice investigation](#) cited several anticompetitive practices, including a secretive agreement between Geisinger and Evangelical Community Hospital to not poach each other's employees.<sup>4</sup> In 2024, when Kaiser Permanente and Geisinger sought federal approval to merge and form Risant Health, they committed to investing at least [\\$2 billion into the Geisinger Health System](#).<sup>5</sup> At every one of these milestones Geisinger argued that these mergers and acquisitions would increase access to care and control costs for consumers, instead our region has seen patient choice decline and healthcare costs continue to rise. So, it is our belief that the Department should contemplate how it can utilize its oversight and regulatory authority to encourage Geisinger to increase healthcare access and reduce costs for residents in northeastern Pennsylvania.

We thank the Department for the opportunity to provide public comment on this very important issue. We hope that the Department will consider the issues that we have raised and continue to support public engagement on the potential impacts of this request for modification.

Sincerely,

Alisha Hoffman-Mirilovich  
Executive Director, Action Together NEPA

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<sup>2</sup> DHS Data Dashboards and Reports. PA Department of Health and Human Services, July 2025. <https://www.pa.gov/agencies/dhs/resources/data-reports#accordion-f267244c79-item-e7148d1356>.

<sup>3</sup> Marines, Emily. "Pennie: More than 104k Pennsylvanians forced to drop statewide health coverage." *WJAC6 NBC News*, February, 27, 2026, <https://wjactv.com/news/local/pennie-more-than-104k-pennsylvanians-forced-drop-statewide-health-coverage-insurance-pennsylvania-officials-state-lawmakers>.

<sup>4</sup> *U.S. v Geisinger Health and Evangelical Community Hospital*, Civil Action No. 4:20-cv-01383-MWB. (PA Mid. Dist., September, 16, 2021), <https://www.justice.gov/atr/case/us-v-geisinger-health-and-evangelical-community-hospital>.

<sup>5</sup> *Health System Agreement By and Among Risant Health, Inc., Geisinger Health, and Kaiser Foundation Hospitals (For the Limited Purposes Set Forth Herein)*, Health System Agreement, April 26, 2023, <https://www.pa.gov/content/dam/copapwp-pagov/en/insurance/documents/companies/industryactivity/corporatetransactionsofpublicinterest/documents/geisinger/03-exhibit%20b%20-%20health%20system%20agreement%20redacted.pdf>.