



MATTHEW YARNELL
President

MORGAN LINDSEY
Secretary-Treasurer

SARAH FISHBEIN
Executive Vice President

SILAS RUSSELL
Executive Vice President

BEN BREWER
Vice President

ALI KRONLEY
Vice President

PATTY LUDWIKOWSKI
Vice President

WENDELL ROYSTER
Vice President

REGINA SIMMONS
Vice President

Executive Board

- Jaime Balsamo
- Brad Barkdoll
- Sandy Baustert
- John Berezansky
- Helen Burke
- Maureen Casey
- April Chirdon
- Lisa Colatruccio
- Stephanie Cole
- Shana Coleman
- Bethany Coudriet
- Amber Deyarmin
- Shelby Dille
- Tisheia Frazier
- Kanann Gemmill
- David Green
- Linda Heater
- Emma Henry
- Nancy Himmelberger
- Rebecca Huffman
- David Jones
- Lori Kreider
- Andrea Leach
- John Matthews
- Suzanne Ott
- Lolita Owens
- Erica Payne
- Jenny Price
- Charissa Ruth
- Louise Santee
- Sarah Scales
- Tina Siegel
- Myra Taylor
- Michael Thomas
- Charles Vincent III
- Pat Webster
- Lynn Weidner
- Kari Xander
- Annale Yobbi

VIA EMAIL (kimsheaffe@pa.gov)

February 27, 2026

Mr. Michael Humphreys, Commissioner
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, PA 17120

RE: Risant-Geisinger Modification Request

Dear Commissioner Humphreys:

We are writing in regard to the public comment process for the Risant’s request for modification of order number ID-RC-24-03-01.

SEIU Healthcare Pennsylvania represents 1,000 healthcare workers at two different Geisinger hospitals as well as thousands of other hospital, nursing home, and homecare workers in northeastern Pennsylvania.

From 2023 to 2025, all Geisinger employees – union and non-union – saw an increase of more than a thirty-three (33%) percent in their out-of-pocket healthcare costs. Health insurance increases of this magnitude mean hard working people and families struggle to afford healthcare amid the other rising costs they face in the form of housing, utilities, food, and education. Those cost increases contributed to a strike of 800 RNs at Geisinger Wyoming Valley Hospital in 2025. Recent KFF polling found that [two-thirds of Americans worry about paying for healthcare](#), making insurance and out-of-pocket costs the largest affordability concern ahead of utilities, food and housing costs. Studies have shown that as health systems grow, prices actually increase ([MedPAC 2020](#); [Gaynor 2008](#); [KFF 2020](#)). With markets already generally consolidated, regulators should require large entities to deploy their massive and growing assets to stabilize insurance markets and guarantee broadening access to high quality care.

Risant’s modification request argues that lowering risk-based capital (RBC) requirements will allow Geisinger to “allocate additional funds toward delivering high-quality care for their members.” But, in order for patients to have meaningful access to healthcare, they must be able to afford that care. And working people, even those working at Geisinger, are struggling to afford healthcare.

-Over-

Mr. Michael Humphreys, Commissioner
Page 2 of 2

Geisinger's healthcare reserves have been built with employers and workers paying into their health plans alongside public dollars. Recent cuts to the ACA marketplace subsidies and Medicaid will only make it harder for working people to afford healthcare. It is critical that the PA Insurance Department help ensure affordability in highly consolidated healthcare and insurance markets by having full information and assurances around rate increases in the coming year, in light of this requested change. We believe it is critical that health insurers use their reserves to lower or freeze costs so that people can access care now, which can lower utilization and overall costs in the long run.

We believe that regulators should use their power to counteract distorted profits and prices caused by high levels of consolidation in health insurance and healthcare markets (monopsony and monopoly power, respectively).

More specifically we would advance three possible steps by the PID in considering this request:

First, we strongly encourage the Department to seek clarity on how Geisinger intends to reallocate resources currently maintaining RBC ratios. We advocate that any changes to the conditions should clearly make insurance and medical care more affordable now and in future years. This is critical in a policy environment that includes cuts to Medicaid and ACA marketplace subsidies, which threaten to destabilize insurance pools with lower revenues, higher risk and the possibility of adverse selection.

Secondly, the Department should consider how to use its regulatory authority to prompt Kaiser to utilize its [\\$82 billion net worth](#) to invest in NEPA through Geisinger to increase healthcare access, freeze plan cost increases, and guarantee Geisinger's insurance liabilities. Such investment would make good on [Kaiser and Risant's commitments to invest at least \\$2 billion in Geisinger](#) and ensure that Geisinger is not bearing the risk of these changes that could impact the insured in Pennsylvania. Having the resources deployed by Kaiser, of which Geisinger is a subsidiary, could help Geisinger move forward with its plans to increase access to high-quality care while also ensuring sufficient reserves and healthcare affordability now and in the future.

Finally, we recommend that any approval by the Insurance Department should come with clear commitment by Kaiser, Risant and Geisinger to reduce or freeze healthcare costs for residents of NEPA in the coming years.

We thank the Department for the opportunity to comment on this important issue. We encourage the Department to continue public engagement on the potential impacts and opportunities of the modification request through a public hearing.

Sincerely,



Matt Yarnell
President, SEIU Healthcare PA