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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON,  
  
Plaintiff,

NO. 2:20-cv-01105

DECLARATION OF  
THEA N. MOUNTS

v.

UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES;  
ALEX M. AZAR, in his official capacity as  
the Secretary of the United States  
Department of Health and Human Services,

Defendants.

Pursuant to 28 U.S.C. § 1746(2), I, Thea N. Mounts, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I am over the age of 18 and competent to testify in this matter.

2. I have been employed with the Washington State Office of Financial Management since 1998. I am currently a Senior Forecast and Research Manager and the Directory of the Statistical Analysis Center. My duties include supervising a staff of thirteen master’s and doctorate-level professionals who develop forecasts and conduct research and analysis on health and health systems, criminal justice, and social services. I also coordinate and oversee staff in the development of Washington’s \$15 billion biennial Medicaid program

1 expenditure forecast and the WorkFirst and Working Connections Child Care program forecasts.  
2 Other responsibilities have included overseeing and managing Washington's All Payer  
3 Healthcare Claims Database, and coordinating with the U.S. Bureau of Justice Statistics and the  
4 Justice Research and Statistics Association to conduct and publish policy-relevant research on  
5 justice issues. I also oversee and manage multiple grants from the Department of Justice and the  
6 Centers for Medicare and Medicaid Services.

7 3. I hold a Bachelor of Arts in Mathematics from Colgate University in Hamilton,  
8 New York, a Master of Arts in Sociology and Demography from the University of Washington  
9 at Seattle, Washington, and an Executive Management Certificate from the Cascade Center for  
10 Public Service and Leadership at the University of Washington. I have received several awards  
11 for excellence in my field, including the 2018 Innovation in Data Dissemination Award for the  
12 Washington HealthCareCompare Website, awarded by the National Association of Health Data  
13 Organizations and the 2006 Office of Financial Management Director's Award for the Medicaid  
14 Forecast Project.

15 4. I have been asked to provide official estimates of the population and healthcare  
16 coverage of certain Washingtonians in this matter. In doing so, I have reviewed and analyzed  
17 data created, compiled, and maintained by the Office of Financial Management for the purpose  
18 of discharging its statutory duties pursuant to RCW Chapter 43.41, which the preparation and  
19 conduct of research, planning, analysis, and recommendations to the Governor and state  
20 departments for the official policy-making and business of the State of Washington. The  
21 following are estimates and data which are drawn from these sources and are as exact as possible  
22 given the limitations of data collection and sampling and other research methodologies.

23 5. The population of Washington State is approximately 7,656,200 people as of  
24 April 1, 2020.<sup>1</sup>

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26 <sup>1</sup> Press Release, Washington State Office of Financial Management, Washington tops 7.6 million  
residents in 2020, *available at*

1 6. I have been asked to provide an official estimate of the number of individuals in  
2 Washington State who receive healthcare coverage through a group healthcare plan that is  
3 established and funded by an employer, also called a “self-insured” or “self-funded” plan. Such  
4 a plan is distinct from private healthcare insurance purchased by an individual or an employer  
5 from an insurer by the payment of premiums, or healthcare coverage provided by the government  
6 such as Medicare or Medicaid.

7 7. As of 2018, we estimate that 1,385,380 people in Washington State receive  
8 healthcare coverage under private-sector employer’s self-insured or self-funded plans. We  
9 estimate that this number is at least this high as of 2020 given the trend of more smaller and  
10 medium-sized employers to provide healthcare coverage through a self-insured or self-funded  
11 plan.<sup>2</sup>

12 8. I have also been asked to provide an official estimate of the number of individuals  
13 in Washington State who receive healthcare coverage through a healthcare plan that is part of  
14 the Federal Employee Health Benefits Program.

15 9. As of 2017, we estimate that 198,301 people in Washington received  
16 employment-based health insurance for government employees as part of the Federal Employee  
17 Health Benefits Program.<sup>3</sup>

18 EXECUTED on this 13 day of July, 2020 in Olympia, Washington.

19   
20 THEA N. MOUNTS

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23 [https://www.ofm.wa.gov/sites/default/files/public/dataresearch/pop/april1/ofm\\_april1\\_press\\_release.pdf](https://www.ofm.wa.gov/sites/default/files/public/dataresearch/pop/april1/ofm_april1_press_release.pdf) (last  
visited July 3, 2020).

24 <sup>2</sup> See Self-Insured Health Plans: Recent Trends by Firm Size, 1996–2018, a Report of the Employee  
Benefits Research Institute, August 1, 2019, p. 7, available at [https://www.ebri.org/docs/default-source/ebri-issue-brief/ebri\\_ib\\_488\\_selfinsur-1aug19.pdf?sfvrsn=bd7e3c2f\\_6](https://www.ebri.org/docs/default-source/ebri-issue-brief/ebri_ib_488_selfinsur-1aug19.pdf?sfvrsn=bd7e3c2f_6).

25 <sup>3</sup> See Washington State Office of Financial Management, Washington State Health Services Research  
26 Project, Public-funded Health Coverage in Washington: 2017, Research Brief No. 92, August 2019, available at  
<https://ofm.wa.gov/sites/default/files/public/dataresearch/researchbriefs/brief092.pdf>.