

OIC Rules Coordinator

From: paulak@drkeeler.com
Sent: Thursday, August 7, 2025 2:46 PM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication draft comment Urgent Concern Regarding Auto Insurance Claim Reductions and Impact on Patient Care

External Email

Dear Commissioner Kuderer,

We are writing to express serious concerns regarding how Personal Injury Protection (PIP) insurance carriers are failing to uphold the full scope of coverage promised to policyholders. These practices are directly impacting the ability of injured patients to access necessary care and are placing undue financial burden on both patients and providers.

We have repeatedly experienced unexplained and arbitrary reductions in payments from auto insurance companies for medically necessary services. These reductions are made without justification or clear communication, leaving patients afraid to seek ongoing treatment due to fear of unexpected out-of-pocket expenses—despite having paid premiums for coverage they expect to rely on after an accident.

Of particular concern is the use of the FAIR Health database by insurers to justify payment reductions. There is a troubling lack of transparency around how this database is applied. Patients and providers alike are left in the dark, with no explanation of the criteria used to determine what is “reasonable and customary.” As a result, insurers are effectively dictating medical necessity based on opaque algorithms rather than individual patient needs.

This “one-size-fits-all” approach does not reflect the reality of healthcare, where each patient’s situation is unique. When insurers apply cookie-cutter standards to complex, individualized care, patients suffer—not only physically, but also financially and emotionally. These ongoing denials are damaging the trust between patients and their healthcare providers. They also shift costs back onto the broader healthcare system when providers are forced to absorb losses or when patients delay or avoid care due to cost concerns.

We respectfully urge your office to take action by:

- Demanding transparency and accountability in the use of the FAIR Health database.
- Investigating the fairness and legality of unexplained claim reductions.
- Ensuring insurance companies honor the policies they sell and support timely, appropriate care for injured individuals.

Patients purchase insurance in good faith, believing it will support their recovery. It is vital that these policies deliver on that promise.

Thank you for your time and attention to this matter. We appreciate your advocacy for Washington patients and providers.

Sincerely,
Dr. Lindon Keeler
Paula Keeler
Advanced Health Center
2406 Iron Street
Bellingham, WA 98225
(360) 715-9010