

## OIC Rules Coordinator

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**From:** Analia Alvarez <a.alvarez@cpincwa.com>  
**Sent:** Thursday, August 7, 2025 3:48 PM  
**To:** OIC Rules Coordinator  
**Subject:** R2025-05 First Prepublication draft comment

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### External Email

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Dear OIC,

I'm writing to express serious concerns regarding the use of the FAIR Health database by auto insurers to determine reimbursement for medically necessary treatments. This practice is having a detrimental impact on both healthcare providers and patients, and it demands immediate attention.

Auto insurers are increasingly relying on the FAIR Health database to undercut treatment costs, yet the methodology behind this database remains opaque. Providers and patients alike are left in the dark about how reimbursement decisions are made.

As a result, the financial burden is being unfairly shifted onto providers and patients, who are forced to absorb the costs of care that insurers refuse to cover.

We urgently need full transparency into how the FAIR Health database operates and how it influences reimbursement decisions.

It is unjust that treatment bills are arbitrarily reduced without any real justification based on a patient's individual healthcare needs.

The use of "cook-book medicine" — a one-size-fits-all approach — undermines the personalized care that patients deserve.

Patients pay premiums for auto insurance with the expectation that their benefits will reflect the value of their investment. When insurers fail to honor this, it erodes trust and compromises care.

If you have specific examples of how this practice has impacted your patients or your practice, I encourage you to share those details. These stories are powerful and necessary to drive change.

In my own experience, when bills are cut to just 80% of the actual cost, it leads to additional healthcare expenses that must be covered elsewhere — a burden that is neither sustainable nor fair.

We must advocate for a system that prioritizes transparency, fairness, and the health of our patients. Thank you for your attention to this critical issue.

Sincerely,

**Analia Alvarez**

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