

OIC Rules Coordinator

From: Bryson Bunch <bunchchiro@gmail.com>
Sent: Wednesday, July 30, 2025 9:17 AM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication Draft Comment

External Email

Dear Commissioner Kuderer,

I am writing as a practicing Chiropractor in Washington State to express my strong support for the proposed rulemaking R2025-05, which aims to address the unfair use of the FAIR Health database by auto insurers in evaluating personal injury claims.

In my experience, insurers are increasingly using this opaque and private database to arbitrarily reduce reimbursement on medically necessary treatments for injured patients. My office has received reduced payments often with no explanation, no clear appeal process, and no accountability. This forces patients to either pay the difference out of pocket or forego needed care, leading to poorer health outcomes and additional long-term costs.

The use of the FAIR Health database lacks transparency. It combines data from vastly different geographic and economic regions, resulting in distorted "averages" that do not reflect the true cost of delivering care in our area. This practice effectively penalizes providers operating in higher-cost communities and undermines patient access to care.

Insurance companies market their coverage as comprehensive, yet when patients need it most, they're blindsided by unexpected out-of-pocket costs. This damages patient trust, pits them against their providers, and leaves both parties financially burdened. Medical decision making should be made by credentialed providers and not proprietary algorithms.

We need:

- Full transparency into how FAIR Health data is used to calculate reductions.
- An end to arbitrary cuts that ignore clinical necessity and individual treatment plans.
- A clear appeals process for any reductions in payment.
- Policies that protect the patient-provider relationship and ensure fair reimbursement for services rendered.

I urge you to move forward with this rulemaking and put an end to the current practices that are harming patients and undermining the quality of care in our state.

Sincerely,
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