

OIC Rules Coordinator

From: hiachiro@aol.com
Sent: Wednesday, August 6, 2025 3:31 PM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication Draft Comment

External Email

To the office of the Insurance Commissioner,

I am writing to express support for the proposed rule changes that would prohibit property and casualty insurers from denying or reducing reimbursement for claims without conducting a reasonable investigation.

I also support and recommend additional language to WAC 284-30-380 (8)

"If any insurer uses a database or survey to account for either material pricing, or labor rate, or both, and upon request of the claimant, the insurer must provide the claimant with the date the data was collected, where the data was collected from, which businesses provided the data, and whether the business will honor the price provided if the insured were to consider using them."

I support the addition of language that would include reference to the use of artificial intelligence for claims processing decisions. Consumers deserve to know if technology is the deciding factor or if an insurer uses other metrics or artificial information for claim decisions of all types. As we have learned with the use of third-party vendors who manage claim decision making in commercial health insurance, this section could be further tightened to include language requiring disclosure of all vendors and third-party entities that are either owned by, or contracted with, the carrier to make claims decisions especially when the claim amounts are reduced.

Thank you,

Cathy A. Bangerter, DC