

OIC Rules Coordinator

From: Dusty DuBois <DrDusty@bothellchiropractic.com>
Sent: Thursday, August 7, 2025 3:53 PM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication Draft Comment

External Email

Dear Rules Coordinator,

I am writing as a licensed chiropractor in Washington state to express my support for the proposed rulemaking (R2025-05) that would limit the auto insurers' use of the FAIR Health database to reduce reimbursement on personal injury (PI) claims.

For years, insurers have used this opaque and unregulated database to arbitrarily slash payments for necessary care often cutting reimbursements by 20% or more without explanation or transparency. These reductions are based on aggregated data from undefined and mixed geographic areas, ignoring real-world costs of delivering care in metropolitan regions like mine. This practice is both misleading and harmful.

The impact on my patients is significant: many are hesitant to continue care after learning that their insurer may not cover the full cost of treatment. They fear being saddled with out-of-pocket expenses for services that should be fully covered under their policies. This undermines their recovery and burdens providers with difficult financial and ethical dilemmas.

These cuts are imposed without any regard for the individual needs of the patient or the clinical judgment of the provider.

Patients purchase auto insurance expecting coverage for their recovery. The current system denies them those benefits while putting the financial strain on both patients and providers. This is unfair and unsustainable.

I urge the Office of the Insurance Commissioner to finalize rules that require greater transparency and fairness in claims handling, especially in the use of third-party databases like FAIR Health. Patients and providers deserve a system that honors the terms of coverage and supports timely, necessary care not one that prioritizes hidden algorithms and cost-cutting.

Thank you for your attention to this important issue.

Sincerely,

Dr. Dusty DuBois

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