

## OIC Rules Coordinator

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**From:** Gina Wolf <gina@wolfchiro.net>  
**Sent:** Friday, August 8, 2025 9:31 AM  
**To:** OIC Rules Coordinator  
**Subject:** R2025-05 First Prepublication draft comment

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### External Email

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Dear Insurance Commissioner Kuderer,

I am writing to express my concern about the use of ANY external pricing structure to dictate our reimbursement on personal injury claims, especially those databases containing claims data that reflect decades of stagnant reimbursement levels from the health insurance industry.

Our office has 16 providers from 5 disciplines that care for patients who have been injured in motor vehicle collisions.

When we deliver services to our patients who have suffered injuries in an auto accident, most of whom were not at fault in any way, we act in good faith that our treatment and our fees are 100% reasonable, necessary and directly attributable to the motor vehicle accident. In turn, we expect the auto carriers to uphold their responsibility to the patient with the same high standards.

Allowing auto carriers to arbitrarily reduce payment for our services, especially after the services have been rendered in good faith, without the consent of the provider or the patient cannot be allowed.

Small independent practices face enough economic hardships already. Please don't allow another manner in which the insurance industry is allowed to cripple our economic viability.

Thank you for your support in assuring that the financial relationship between the auto carrier and the patients we serve remains uninhibited by third party databases that are not reflective of the actual costs of managing the complex clinical and legal nuances specific to auto injuries.

Sincerely,  
Dr Gina Wolf

**Gina Wolf DC**

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