

## OIC Rules Coordinator

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**From:** Dr Penaluna <DrP@nwfamchiro.com>  
**Sent:** Wednesday, August 6, 2025 11:59 AM  
**To:** OIC Rules Coordinator  
**Subject:** R2025-05 First Publication Draft comment

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### External Email

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To whom it may concern,

Auto insurers are using FAIR health database to undercut necessary treatments and nobody knows how it works. Patients and providers are being left with the financial burden. We need full transparency on the Fair health database since it is diabolical that insurance companies are driving re-imbursement and providers treatment bills are arbitrarily being undercut with no justification. Insurance companies don't get to decide what patient's need, Doctors do.

Insurance also expects providers to use "cook-book" approaches that they get to control. "Cook-book" methods do not help patients since every patient has individual needs that only the interaction with a licensed health care provider can reveal. Furthermore, patients pay premiums for insurance carriers to cover their injuries, so why should carriers control the recommendations? That is a blatant conflict of interest. There are estimates that suggest insurance re-imbursement will be cut by 80%. If that happens patients will be left with the difference. This is yet another example of cooperate greed, and the cooperate infiltration of government decision making that does nothing to serve people.

Please inform Patty Kuderer that she is hurting Doctors and Patients with her proposed rulemaking changes. It almost seems like she is receiving money and financial incentive to do so, since this can be the only reason a fellow tax paying citizen would make a choice to support diabolical cooperate practices.

Please reconsider this rulemaking.

Sincerely,

**Jason Penaluna DC, DACNB, FABNN, CCSP**

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