

OIC Rules Coordinator

From: Jeremy Welch <drjeremyis@gmail.com>
Sent: Tuesday, July 29, 2025 3:17 PM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication draft comment

External Email

Dear Commissioner Kuderer,

I am writing to raise serious concerns regarding the use of the FAIR Health database by auto insurers in Washington state and the negative impact it is having on both patients and healthcare providers.

Auto insurers are increasingly relying on this opaque database to unilaterally reduce reimbursement for medically necessary treatments. These reductions often occur with no clear explanation, and neither patients nor providers are given insight into how the FAIR Health rates are determined. As a result, patients are left with the financial burden of care that should have been covered by their insurance policies—policies for which they have paid premiums with the expectation of full benefits.

This practice amounts to a “cookbook” style of medicine, where complex, individualized treatment plans are unfairly judged against a generalized pricing model. Healthcare is not “one size fits all,” and reimbursement decisions should not be made without consideration of clinical context and patient needs. Arbitrarily slashing provider bills to 80%—or less—forces clinics like mine to either absorb the loss or pass on additional costs to patients, ultimately making healthcare less accessible and more expensive for everyone involved.

If this trend continues, the sustainability of many practices will be in jeopardy, and patient outcomes will suffer. The lack of transparency and fairness in how FAIR Health data is applied by insurers must be addressed.

I urge your office to take immediate action to investigate this practice, demand full transparency from insurers regarding how the FAIR Health database is being used, and implement guidelines to ensure that treatment decisions and reimbursements are based on medical necessity—not algorithmic shortcuts.

I am happy to provide specific examples from my practice illustrating how this issue has harmed both my patients and my business. I would welcome the opportunity to discuss this further.

Thank you for your attention to this critical issue and for your continued service to the people of Washington.

Sincerely,

Dr. Jeremy Welch