

OIC Rules Coordinator

From: Kevin Polzin DC <drkevin@bellevuepain.com>
Sent: Tuesday, July 29, 2025 2:55 PM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication draft comment

External Email

Dear Commissioner Kuderer,

I'm writing as a 35 year veteran chiropractic physician and clinic owner to express strong opposition to the proposed rule R2025-05 regarding the use of the FAIR Health database by auto insurers in Washington State.

Here's the problem:

- Insurers are already using the FAIR Health database to undercut necessary treatment reimbursements.
- The database is **not transparent** — providers and patients have no idea how it works or how rates are determined.
- As a result, both **patients and providers are left holding the financial bag**.
- Reimbursement cuts of 20% or more have become routine in my clinic, with no legitimate justification and no clear way to appeal.

This is not how insurance is supposed to work.

Patients pay monthly premiums expecting that their medically necessary care — especially after traumatic auto injuries — will be covered. But under this model, insurers are using “cookbook medicine” and spreadsheets to dictate treatment, ignoring the clinical realities of individual patients.

I urge you to **reject this rule** until the following issues are addressed:

- Full transparency into how FAIR Health data is collected and applied
- A clear appeals process for providers
- Protection for patients against balance billing and under-treatment
- Assurance that reimbursement decisions reflect **clinical need**, not insurer profit margins

If this rule moves forward as written, it will drive up out-of-pocket costs for patients and force providers like me to make hard decisions — either reduce care quality or pass costs down to those who can least afford it.

This is not sustainable. And it's not fair.

Please do the right thing and stand up for Washington's patients and ethical providers.

Sincerely,
Dr. Kevin Polzin DC



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