

OIC Rules Coordinator

From: RBNPC <rbtnpc@drsharon.com>
Sent: Thursday, August 7, 2025 11:50 AM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication draft comment

External Email

Dear Commissioner Kuderer,

Comment on R2025-05 First Prepublication draft. Auto insurers should not be allowed to use a secretive database to reduce payment for medical bills in an unknown geographic area. They won't disclose the algorithms to reduce payment, or the geographic areas used. Depending on the geographic area, they can skew data to the biased benefit of the insurance company because they are mixing metro and rural areas where there are vastly different cost factors. This causes the medical office an undue burden if they are unable to collect the remaining balance from the patients and increases the office overhead to try and collect funds that should have been paid by the insurance company responsible for payment.

As someone who pays high premiums for auto insurance, it would be an unfair burden to me if my auto insurance company reduced the payments for my care that the insurance company has a responsibility to pay. Currently, we have 2 patients with auto claims with Allstate and Safeco. Both companies are using a "Fair Health Charge Benchmark Database". This forces this office to transfer the unpaid portion to our patients. As of today, our patients have paid out of their own pocket \$935.73 and \$580.33 respectively. As the patients continue care their out-of-pocket expense increases, when they are already paying premiums to these companies.

Not all patients are able to continue care if their insurance company reduces payment for the patients' medical bills because it will be an out-of-pocket expense. This keeps the patient from receiving care they need and their ability to heal. This is unfair to the patients who faithfully pay their insurance premiums, that are required by law to have.

Please support the proposed rulemaking that includes language that would keep the insurance companies from using the "Fair Health Database" to arbitrarily reduce personal injury claims.

Thank you for taking the time and consideration.

Sincerely,

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