

OIC Rules Coordinator

From: Paul Early <pearly@northstarchiropracticcenter.com>
Sent: Tuesday, July 29, 2025 2:37 PM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication draft comment

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Dear Sir or Madam,

I am writing to express growing concerns about the use of the FAIR Health database by auto insurers in determining reimbursements for medically necessary care. I believe use of the FAIR Health Database should be extremely limited for the following reasons:

- Auto insurers are increasingly relying on the FAIR Health database to reduce or deny payments for legitimate treatments. However, the methodology behind this database remains unclear to patients, providers, and even regulators.
- This lack of transparency is resulting in patients and healthcare providers unfairly shouldering the financial burden of care.
- Providers' treatment plans are being arbitrarily undercut, with little to no explanation, regardless of the clinical necessity or individual needs of the patient.
- The use of generalized data or "cookbook" medicine as a one-size-fits-all reimbursement model fails to reflect the complexity and nuance of actual patient care.
- Patients who pay for auto insurance premiums rightfully expect to receive the full range of benefits promised — not to have medically indicated care denied based on opaque data algorithms.

We urgently need full transparency into how the FAIR Health database is used, and stronger oversight to ensure that reimbursement decisions are fair, justified, and based on individualized patient needs — not arbitrary averages.

In Good Health,

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