

OIC Rules Coordinator

From: Robert Curtis <drrecurtis@yahoo.com>
Sent: Thursday, July 31, 2025 12:34 PM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication draft comment

External Email

Hello,

My name is Dr. Bob Curtis, I own and operate Advanced Sports Chiropractic in Bellingham, WA, and am reaching out to ask that consideration be strongly given to NOT allow auto insurers to change the pay structure to their providers. I have been in practice 19 years and am primarily dependent upon private insurance companies and their contracted payouts, and also work with personal injury and work related claims.

There has never been a contract with auto insurers which has allowed us to bill and collect 100% of our billed rates. We have always seen fair and equal compensation for the work being provided to help improve the health of the client of the auto insurer. Until the past 5+ years, many insurance companies have been reducing their fees by \$5-\$15 per date of service, claiming "an adjustment to standardized rates". This happened negotiation or discussion, and as we are a production based business, \$5 per visit over 30 visits a day can add up to quite alot of money lost.

As a paying customer of private health insurance, I, and likely you all at the OIC, have felt the increase in cost that private insurance companies are doing every year. These costs continue to rise, the benefits we all sign up for that we hope will be there if we get sick or injured continue to diminish, to the point, what are we paying for? This line of thinking is being implemented into the auto insurance world, effectively limiting care and benefits that paying clients pay into for YEARS without every using a thing.

In my 19 years in the chiropractic profession, I have seen few, if any, pay raises to chiropractors for the work we do taking care of the private insurance clients. How does one run a business with a fixed rate of pay for almost 20 years, and continue to survive? It isn't easy, that's for sure, and if we lose income from the auto insurers this will also limit our ability to provide care to these paying clients also.

One example of a 22 yr old patient who's insurance seller didn't disclose Washington state laws that make every have Personal Injury Protection (PIP) insurance, and gave this patient a form stating that she could sign this and lower her rates. This patient then ended up in a motor vehicle collision, rear ended at a stop sign at a high rate of speed, causing this patient significant whiplash injuries. This patient came in for care, and we found out she had no PIP coverage, nor did the At-Fault driver, putting the patient in the stressful situation of trying to figure out how to pay for and get care. The auto insurance company told her she had no recourse, they would not support her, and it was not their problem. So, her only course of action is a lawsuit of the At-Fault driver and their insurance company. My patient was not properly informed, had paid for her insurance with the understanding that it was there to cover her in moments of need, and the auto company disregards her and their responsibility to care for her as a client.

This situation will continue more and more with cutting rates, as these auto insurance companies continue to limit their benefits and push responsibility away onto their paying client. THIS IS NOT WHY WE PAY FOR INSURANCE and this behavior needs to be stopped.

Please do not allow insurance companies of any kind to continue to abuse providers and take advantage of their paying customers in the ways described above, and so many more.

Sincerely,

Dr. Bob Curtis, DC, CCSP