



SUPPORTING NATUROPATHIC
PHYSICIANS FOR OVER
90 YEARS

Office of the Insurance Commissioner
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To Whom It May Concern:

I am writing on behalf of the Washington Association of Naturopathic Physicians (WANP) to express support for the proposed rule changes that would prohibit insurers from denying or reducing reimbursement for claims without conducting a reasonable investigation. In particular, we strongly support of the inclusion of the following language in WAC 284-30-330 (4) as proposed: *"Any denial or refusal to pay claims in part or in full without conducting a reasonable investigation. A reasonable investigation includes, but is not limited to, conducting an individual assessment of either the covered loss or damages, or both, and cannot rely solely on the use of a database."*

We also strongly support the proposed addition of WAC 284-30-380 (8): *"If any insurer uses a database or survey to account for either material pricing, or labor rate, or both, and upon request of the claimant, the insurer must provide the claimant with the date the data was collected, where the data was collected from, which businesses provided the data, and whether the business will honor the price provided if the insured were to consider using them."* However, we respectfully urge that additional language be considered that would directly reference the use of artificial intelligence (AI) for claims processing decisions. Our patients have a right to know if and when technology is being used by their insurer to make decisions regarding their health care and claims, especially when the claim amounts are reduced. The growing and harmful trend by the insurance industry to reduce or deny claims based solely on database-generated pricing benchmarks, which are not public, makes this additional language regarding the disclosure of technology necessary and timely.

As statute-recognized primary care physicians in Washington, naturopathic physicians are appropriately concerned with insurers' reliance on technology to make health care decisions without reviewing the clinical documentation, medical necessity, or outcomes of care. Databases disregard the individual assessment that is fundamental to ethical and lawful claims handling. The WANP supports the proposed rule change that requires insurers to move beyond automated claim denials and engage in a genuine investigation—one that includes an individualized assessment and does not rely solely on a database, or outside vendors, to justify decisions.

Thank you for proposing language that will help ensure that patients and providers have access to a fair and transparent claims process.

In health,

Angela Ross, ND
Executive Director