

OIC Rules Coordinator

From: aaron@englandchiro.com
Sent: Wednesday, July 30, 2025 8:31 AM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication draft comment

External Email

Dear Commissioner,

I'm writing to express deep concern over the use of the FAIR Health database by auto insurers to arbitrarily reduce reimbursement for medically necessary treatments. This practice—often capping payments at the 80th percentile of regional charges—ignores patient complexity, provider expertise, and actual medical necessity. It shifts the financial burden onto patients and providers, despite patients paying premiums with the expectation of full coverage.

The lack of transparency around FAIR Health's methodology and its application by insurers is unacceptable. Providers are left without justification for cuts, and patients face delayed or reduced care. This "cookbook medicine" approach undermines individualized treatment and threatens the sustainability of quality care in Washington.

I urge your office to:

- Require full transparency on how FAIR Health data is used in reimbursement decisions
- Mandate individualized medical necessity reviews rather than statistical comparisons
- Protect patients and providers from arbitrary underpayments that jeopardize care

Thank you for your attention to this critical issue.

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