Whalen Family Chiropractic Center

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To: Washington State Insurance Commissioner

I strongly OPPOSE Insurance companies from using the Fair Health database. Here are some of the reasons why:

Auto Insurers Are Using FAIR Health to Deny Necessary Care—And Patients Are Paying the Price. Auto insurers are increasingly relying on the FAIR Health database to make unilateral decisions about cutting reimbursement for medically necessary treatments. While this database is marketed as a benchmark for "usual and customary" charges, the truth is that it operates without transparency—and often without regard for a patient's actual clinical needs.

Providers and patients are being left to shoulder the financial burden.

When insurers use FAIR Health to justify slashing bills—sometimes by 20% or more—without any real medical review, patients are denied access to the full benefits they've paid premiums for. The cuts aren't based on outcomes, patient history, or provider expertise—they're based on an opaque pricing system that no one outside the insurance industry can audit or fully understand.

This is *cookbook medicine* at its worst—an impersonal, one-size-fits-all model being used to override individualized clinical judgment.

As a provider, I've seen firsthand how this practice puts both patient health and provider viability at risk. When my treatment plans are arbitrarily underpaid, patients may delay care, reduce visits, or have to pay out-of-pocket to continue necessary treatment. This leads to worse health outcomes and, paradoxically, *higher* healthcare costs in the long run as untreated issues escalate.

If my bills are routinely cut to 80%, I'm forced to either absorb the loss or pass on costs—creating inefficiencies, resentment, and distrust across the entire system.

We need full transparency into how the FAIR Health database is used—and how reimbursement decisions are made. Insurers should not be allowed to hide behind proprietary systems while denying care to injured individuals who have done their part by paying premiums.

Sincerely,

Aaron Whalen, D.C.

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