

## OIC Rules Coordinator

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**From:** Brandon Velasco <b.velasco@hotmail.com>  
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**To:** OIC Rules Coordinator  
**Subject:** R2025-05 First Prepublication draft comment

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### **To the Washington State Office of the Insurance Commissioner:**

As a Chiropractor, we strongly support the proposed changes to WAC 284-30-330 and WAC 284-30-380 that require insurers to conduct a reasonable, individualized investigation before denying or reducing claims. These rules are essential to stop the growing practice of insurers using database-driven decisions—such as those from Fair Health—to unfairly reduce chiropractic reimbursements without reviewing clinical documentation or medical necessity.

We support the following proposed language for WAC 284-30-330(4):

“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 recommend strengthening WAC 284-30-380(8) by adding:

“If any insurer uses a database or survey to account for either material pricing or labor rates, and upon request of the claimant, the insurer must provide the source of the data, the date it was collected, which businesses provided it, and whether those businesses would honor the pricing.”

We also urge the Commissioner to include language requiring disclosure of third-party vendors and the use of artificial intelligence in claims decisions. Patients deserve to know who or what is making decisions about their care.

Chiropractic care is clinically effective and cost-saving. Peer-reviewed studies and agencies like the CDC and Washington L&I support it as a first-line, non-opioid treatment for musculoskeletal pain. Yet insurers continue to undervalue it through non-transparent database pricing.

This rule is a needed step to restore fairness and transparency in claims handling and ensure patients get the care they’re paying for.

Thank you for your leadership on this important issue.

Sincerely,

Brandon Velasco, D.C.

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