

OIC Rules Coordinator

From: G.E. Moon II <gemoon2@aol.com>
Sent: Monday, August 4, 2025 4:14 PM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication Draft Comment

External Email

Dear Commissioner Kuderer,

I'm a Clinic Director for a chiropractic clinic here in Olympia, and I'm reaching out on behalf of the many patients we care for who are often too overwhelmed or too afraid to speak up themselves. These are people recovering from motor vehicle collisions...people who expected their insurance would be there to support them when it mattered most.

They've done their part. They've paid into their policies and followed the process. But when it comes time to get the care they truly need, the reimbursement is cut without warning or explanation. What starts as hope quickly turns into confusion and distrust.

At the center of this issue is the FAIR Health database. It's promoted as fair and neutral, but in practice, it's anything but. The data is hidden from public view, the methodology is unclear, and the results have little to do with the actual costs of providing care. It pulls generalized averages from mixed areas and applies them without context to specific injuries and individual treatment plans. The damage that causes is not theoretical...it's real, and we see it every week in our office.

We've had claims reduced to 80 percent or less, based not on clinical need, but on numbers generated by an outside system that was never built to treat patients. No communication, no transparency, and no justification.

As a small clinic, we are left with a choice. we can take the financial loss myself, or we can pass the balance to the patient. Neither of those options feels right. In both cases, someone loses. Often, it's the patient who ends up feeling caught in the middle, questioning their decision to even start care. Some never return. Others give up entirely. And the result is a deeper cost to their long-term health and recovery.

This database has no rightful place in determining what care is worth. It's a tool for cost-cutting, not healing. It erodes trust in providers, adds unnecessary stress to patients, and rewards insurance companies for avoiding responsibility.

I am urging you to lead the charge in banning the use of FAIR Health in personal injury claims here in Washington. This system is not built to serve people...it serves profits. We need policy that puts human beings first.

Please help us protect the right to receive meaningful care after injury. Help restore faith in the insurance system. And help support providers and clinics like ours who are doing everything we can to keep people healing and whole.

Thank you for your time and your commitment to doing what's right.

Sincerely,

G.E. Moon II

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*"In Vain We Build The City If We
Do Not First Build The Man."*

Edwin Markham