

McKnight, Remy (OIC)

From: Justin Lewis <justin@accurateab.com>
Sent: Sunday, September 28, 2025 4:55 PM
To: OIC Rules Coordinator
Subject: Public Comment on R 2025-04 – Automobile Insurance Appraisal Umpire Registration

External Email

Good evening,

I submit these comments in response to the Office of the Insurance Commissioner's (OIC) proposed rulemaking (R 2025-04) regarding the registration of umpires in automobile insurance appraisal processes.

I am the President of Accurate Auto Body, an OEM certified collision repair facility in Redmond, and the President of the Washington Independent Collision Repairers Association (WICRA), which represents collision repair businesses across Washington State. Our members include OEM-certified facilities and highly trained independent repairers who are responsible for returning thousands of vehicles each year to pre-loss condition following manufacturer standards.

WICRA's Perspective

WICRA members consistently report systemic problems in Washington's claims process tied directly to the lack of technical training and qualifications of insurance adjusters. These adjusters, who often dominate the appraisal process, are not collision repair professionals. They lack hands-on knowledge of OEM repair procedures, I-CAR training, and the realities of repairing today's complex vehicles equipped with advanced driver assistance systems (ADAS), high-strength steels, aluminum, and sensitive electronics.

I have personally had tenured adjusters admit to me that they had never dealt with certain vehicles and did not know the requirements to repair of the vehicle they were assigned to

appraise. In one instance, an adjuster admitted to me that she requested for the vehicle to be reassigned because she had never seen a Rivian before, let alone wrote for damage on one. She said the request was denied by her manager, and she was told to “just deal with it”. This is alarming. Modern vehicles demand specific OEM procedures, safety calibrations, and material-specific techniques. An adjuster who acknowledges they do not understand these requirements cannot credibly determine what is reasonable and necessary in a repair plan. Yet these are the very individuals who regularly challenge, reduce, or deny repair costs.

From my own experience, one of my estimators is a former insurance adjuster that worked for a major carrier. He has repeatedly told me, and testified before the legislature, that he was provided little to no technical training. He was told his job as an adjuster was to “adjust repair costs down” and to never approve a repair facility’s full repair plan. He recalled one instance involving a Toyota Tacoma with a buckled frame rail. The shop’s repair plan called for repair of the rail, but he wrote to replace it due to the severity of the damage. His manager scolded him, telling him that adding cost to the claim was unacceptable, that the shop carried the liability, not the insurer, and that he should not have made the change. This shows not only the lack of repair knowledge within insurance companies, but also a deliberate culture of cost suppression at the expense of safety.

Instead of deferring to the technical expertise of trained collision professionals, insurers allow untrained adjusters to impose their judgment — often based on cost-containment priorities, not repair safety. Members repeatedly encounter adjusters who:

- Dismiss OEM procedures as “recommendations.”
- Exclude one-time-use parts, safety inspections, and required blends.
- Ignore corrosion protection, rivet and bonding requirements, and ADAS calibrations.
- Undervalue repair costs by substituting insurer “guidelines” for manufacturer repair standards.

These failures create unsafe repair pressures on shops, financial harm to consumers, and unnecessary disputes that end up in the appraisal process.

Why This Rule Matters

Repair cost disputes are not abstract “insurance” questions — they are technical questions about how a vehicle must be restored to perform safely in a subsequent collision. Yet the draft rule continues to privilege insurance backgrounds rather than repair expertise when defining who may serve as an umpire. This creates a dangerous imbalance: insurers send in adjusters with little or no repair competency, while consumers and their shops are forced to defend OEM standards against individuals who do not understand them.

WICRA’s Recommendations

For repairable vehicle disputes, umpires must have demonstrable repair expertise, not just insurance claims appraisals. We urge the Commissioner to expand the rule to require:

- I-CAR Platinum certification in all technician roles (structural, non-structural, refinish, welding, electrical/diagnostics) — excluding only estimating and appraising.
- Documented OEM collision repair training specific to the makes involved.
- Hands-on experience as a collision repair technician or repair planner, preparing and executing OEM-compliant repair plans.
- Proven access to OEM repair information (body repair manuals, service bulletins, position statements).
- A sworn oath of impartiality and documented ethics training.

For total loss valuation disputes, different qualifications apply (e.g., market valuation experience). But under no circumstances should insurance adjusting experience alone qualify an individual to preside over repair cost disputes.

Protecting Washington Consumers

The appraisal process was designed as a safeguard for policyholders. It cannot serve that role if untrained insurance adjusters, acting as appraisers or umpires, are allowed to overrule OEM repair standards. WICRA members see daily evidence that consumers are disadvantaged by this imbalance, facing out-of-pocket costs and unsafe repair pressures.

Conclusion

On behalf of independent collision repairers across Washington, WICRA strongly urges the Commissioner to revise R 2025-04 to establish distinct qualification standards for repairable losses versus total loss valuation, with mandatory repair expertise — including I-CAR Platinum certification in all core collision disciplines — for repairable vehicle umpires. This is the only way to ensure the appraisal process produces fair, technically competent outcomes consistent with RCW 48.18.620 and consumer safety.

Thank you,

Justin Lewis
Accurate Auto Body
9042 Willows RD NE
Redmond, WA 98052
425-883-2450

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