

## McKnight, Remy (OIC)

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**From:** Robert McDorman <rmcdorman@autoclaimspecialists.com>  
**Sent:** Sunday, September 28, 2025 4:14 PM  
**To:** OIC Rules Coordinator  
**Cc:** info@ccofwa.com  
**Subject:** New Section: WAC 284-20-310 Automobile insurance appraisal – Umpire  
  
**Importance:** High

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### External Email

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Dear Washington Office of the Insurance Commissioner,

Thank you for allowing me to issue my comments about the above-referenced appraisal process.

I recommend that appraisers and umpires be licensed, bonded and carry a \$1,000,000 E&O coverage policy. Engineers are seldom used in the motor vehicle repair process, so once the loss dispute is elevated to independent appraisers and or/an umpire to decide the safe and proper repair methodology, they should be held to a higher standard. The collision industry today is no longer made up of blacksmiths. These men and women that are the backbone of the collision industry are educated, trained collision repair professionals that are expected and required to understand how to safely repair very highly technical vehicles with many variances, special repair procedures, processes and needs. The technical requirements vary starkly between each vehicle, guiding us how to repair the vehicle back to its pre-loss condition safely and to the best of one's human ability. For this reason, it is my professional opinion the appraisers and umpires should be held to a higher standard and liability. It is my unwavering position that anytime there is a loss dispute on the personal property (auto) claim, the dispute should be handled by (TRULY) independent industry expert appraisers and umpires that are licensed by the Washington Department of Insurance, with the license requiring a minimum of 40 hours continuing education for each licensed period, a minimum \$100,000 bond and a \$1,000,000 E&O (errors and omission) policy. This is needed if we are to hold the independent appraiser and umpire in an auto claim liable for the binding repair plan they agree to through the appraisal process. *The only way to ensure the appraisal and umpire process is truly independent is to hold the appraisers and umpires accountable and liable.*

We must always remember and keep at the front of our thoughts, "Safe Repairs Save Lives." *Requiring the appraisers and umpires to be licensed, bonded and insured will help ensure a truly unbiased arena.* Law makers have given the Washington Department of Insurance the authority to do just this. We should all do everything in our power to make sure this happens. Always, what gets measured gets done!

The Mandatory Appraisal rule making and appraiser and umpire criteria phase to adopt rules mandating an appraisal for total loss and delineating property damage subject to the appraisal is critical to the appraisal process. Industry experts have done an excellent job making law makers problem-aware to give the needed backing for adapting criteria, rules and requirements for appraisers and umpires. *We now must be solution aware.* I am confident with the information and data provided to the Department of Insurance they will set the correct rules and qualifications in place for motor vehicle loss disputes. I have complete faith in this.

In closing, thank you again for allowing me to comment on this sensitive subject.

Sincerely,



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