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To: Members of the Florida Legislature

Re: AAO-HNS Support for HB 1015 / SB 1130 – Insurance Claims Payments

Date: February 12, 2026

On behalf of the American Academy of Otolaryngology–Head and Neck Surgery (AAO-HNS), which represents more than 12,000 ear, nose, and throat physicians and surgeons nationwide, I am writing to express our strong support for HB 1015 / SB 1130, legislation that promotes fairness, transparency, and clinical integrity in health insurance claims payment and utilization review practices.

AAO-HNS supports policies that preserve physician-led clinical decision-making and ensure that health care providers are paid accurately and promptly for medically necessary services. We are particularly encouraged that HB 1015 / SB 1130 establishes clear standards governing downcoding, including appropriate notice, medical record review, and meaningful appeal rights, while reinforcing a presumption in favor of a licensed physician’s diagnosis and ordered services absent a verified coding error.

The bill’s requirement that downcoding decisions be grounded in clinical review, including peer review by a licensed physician, is especially important. These safeguards help ensure that payment determinations reflect sound medical judgment rather than non-clinical payment edits and promote greater transparency and accountability in claims adjudication.

In addition, the bill’s provisions addressing prior authorization practices are critical to maintaining patient access to timely care. Preventing sudden changes to prior authorization requirements and improving transparency around adverse determinations will help reduce unnecessary delays and administrative burdens that can interfere with patient treatment.

Inappropriate downcoding and utilization review practices can undermine patient access to specialty care and place significant strain on physician practices. This legislation establishes important

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guardrails to ensure that coverage and payment decisions are clinically grounded and predictable, allowing physicians to focus more time on caring for patients.

This approach is consistent with broader physician community efforts, including principles reflected in the American Medical Association's Transparency in Downcoding Model Act, which emphasizes clinical review, transparency, and due process when payers alter codes or reduce payment.

AAO-HNS appreciates your leadership on this important issue and looks forward to continuing to work with you to support policies that protect patients and promote fair, predictable payment practices for physicians in Florida.

Sincerely,



Rahul K. Shah, MD, MBA
Chief Executive Officer
American Academy of Otolaryngology–Head and Neck Surgery