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Andrew G. Shuman, MD, HEC-C

To: Members of the Senate Commerce and Labor Committee

Date: February 20, 2026

Re: Support for SB 2020 – Health Insurance Claims Adjudication and Downcoding Standards

Dear Chair and Members of the Committee:

On behalf of the American Academy of Otolaryngology–Head and Neck Surgery (AAO-HNS), which has approximately 13,000 members nationwide, I write to express our strong support for Tennessee Senate Bill 2020.

AAO-HNS supports policies that preserve physician-led clinical decision-making and ensure that health care professionals are reimbursed accurately and promptly for medically necessary services. SB 2020 advances these goals in Tennessee by establishing clear standards governing downcoding practices and promoting clinical integrity, transparency, and accountability in health insurance claims adjudication.

Otolaryngologists provide specialized care to patients across Tennessee with complex conditions affecting the ears, nose, throat, and related structures of the head and neck. These services often involve nuanced diagnostic evaluation and procedural decision-making. Requiring that downcoding determinations be grounded in appropriate clinical review, rather than non-clinical payment edits or automated adjustments, helps ensure that reimbursement decisions reflect the documented complexity of the patient's condition and the physician's medical judgment.

By clarifying standards for when and how downcoding may occur, SB 2020 strengthens fairness and predictability in the claims process for Tennessee physicians and their patients. Clear guardrails around reimbursement practices help reduce unnecessary administrative burdens on medical practices and protect patient access to timely specialty care.

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The approach reflected in SB 2020 is consistent with broader physician community principles emphasizing that payment determinations should not substitute payer judgment for the treating physician's documented clinical decision-making.

For these reasons, AAO-HNS respectfully urges your support for SB 2020. Thank you for your consideration of this important legislation affecting Tennessee patients and physicians. Please do not hesitate to contact us if we may serve as a resource.

Sincerely,



Rahul K. Shah, MD, MBA  
Executive Vice President / CEO  
American Academy of Otolaryngology–Head and Neck Surgery