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To: Members of the Virginia Legislature

Re: AAO-HNS Support for HB 484 / SB 164 – Downcoded Health Insurance

Date: February 11, 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 AAO-HNS’ strong support for HB 484 / SB 164, legislation that promotes ethical, transparent, and clinically grounded health insurance business practices related to downcoded claims.

AAO-HNS strongly supports the proposed requirement that decisions to downcode a claim be reviewed by a licensed clinician. Ensuring that qualified health professionals are involved in claims determinations is essential to protect physician judgment and safeguard patient access to medically necessary care.

We also appreciate the legislation’s transparency and appeal provisions, which require insurers to provide clear notice when a claim is downcoded and meaningful information regarding the reason for the decision and how to appeal it. Establishing a workable, clearly defined appeal pathway helps ensure accountability in claims adjudication while reducing unnecessary administrative burden on physician practices.

Importantly, HB 484 / SB 164 help ensure that downcoding decisions are grounded in documented clinical review and subject to appropriate oversight. These safeguards promote fairness, consistency, and trust in the claims process.

Inappropriate downcoding can delay treatment, disrupt continuity of care, and impose significant strain on physician practices. By reinforcing physician-led clinical judgment, transparency, and due process, HB 484 / SB 164 implement an important step toward ensuring that claims decisions are based on clinical expertise rather than non-clinical payment edits.

T: 1-703-836-4444
F: 1-703-683-5100
W: www.entnet.org
A: 1650 Diagonal Road, Alexandria, VA 22314

This approach is consistent with broader physician community principles, including those reflected in the American Medical Association's model policies addressing automatic downcoding and the need for clinical justification and transparency.

AAO-HNS appreciates your leadership on this issue and looks forward to working with you as this legislation moves forward in the General Assembly.

Sincerely,



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