

Submitter: Heather Bardfield  
On Behalf Of:  
Committee: Joint Committee On Information Management and  
Technology  
Measure, Appointment or Topic: HB4054

Co-Chairs Pham, Nathanson and Members of the Joint Information Management and Technology Committee, my name is Heather Bardfield and I am writing on behalf of Broadway Medical Clinic to urge your support of HB 4054.

This bill adds much needed transparency to the emerging issue of down coding. Down coding happens when a clinic or provider treats a patient and submits a claim for reimbursement, and the health insurer reimburses them at a lower-level code.

Recently, some insurers have begun using artificial intelligence and automated algorithms to down code large volumes of claims in bulk. The lack of transparency surrounding how these technologies operate, including what criteria are used, how decisions are made, and whether clinical context is adequately considered, makes it extremely difficult for clinics to identify when and why claims have been down coded. As a result, clinics must devote significant staff time and resources to manually review payment discrepancies, investigate down coded claims, and pursue appeals. This administrative burden diverts limited clinical and operational resources away from patient care.

This practice builds upon a longstanding trend in which many health plans already rely on automated software to routinely deny or reduce reimbursement for standard office visit codes. In effect, insurers shift the burden onto providers to repeatedly “prove” that medically appropriate and commonly delivered care was provided—despite the fact that such services are well-documented, clinically routine, and fundamental to patient care delivery.

At the end of the day, this issue is not about technology or administrative processes, it is about patients. When clinics are forced to absorb the cost of opaque, automated payment decisions, the real impact is felt by the communities we serve through longer wait times, reduced services, and fewer resources available for patient care. Transparency is not a barrier to innovation; it is a safeguard for patients.

I respectfully urge your support of HB 4054.