

April 18, 2023

David Cordani
Chairman and Chief E/M) Current Procedural Terminology (CPT

99213, 99214, and 99215 and modifier 25 when a minor procedure is billed. Cigna recently notified network providers that payment will be denied for E/M services reported with modifier 25 if records documenting a significant and separately identifiable service are not submitted with the claim. We share Cigna's belief that appropriate use of modifier 25 should be paid in full for both the E/M service and procedure, while inappropriate use of modifier 25 should be prevented. **We urge Cigna to reconsider this policy due to its negative impact on practice administrative costs and burdens across medical specialties and geographic regions, as well as its potential negative effect on patients, and instead partner with our organizations on a collaborative educational initiative to ensure correct use of modifier 25.**

Strong clinical basis for correct use of modifier 25

While the stated intent of this policy is to reduce inappropri-

and CPT guidelines indicating that an E/M service reported with modifier 25 **does not need a different diagnosis** than what was reported for the concurrent procedure.

Administrative Burden and Waste

Our organizations are alarmed by the significant administrative burdens and costs for health care professionals— and Cigna—that will result from implementation of this policy. By bluntly requiring clinical documentation for all claims for

American College of Obstetricians and Gynecologists
 American College of Physicians
 American College of Rheumatology
 American College of Surgeons
 American Epilepsy Society
 American Gastroenterological Association
 American Geriatrics Society
 American Nurses Association
 American Optometric Association
 American Orthopaedic Foot & Ankle Society
 American Osteopathic Association
 American Podiatric Medical Association
 American Psychiatric Association
 American Rhinologic Society
 American Society for Clinical Pathology
 American Society for Dermatologic Surgery Association
 American Society for Gastrointestinal Endoscopy
 American Society for Radiation Oncology
 American Society of Anesthesiologists
 American Society of Cataract and Refractive Surgery
 American Society of Dermatopathology
 American Society of Echocardiography
 American Society of Interventional Pain Physicians
 American Society of Neuroradiology
 American Society of Nuclear Cardiology
 American Society of Plastic Surgeons
 American Society of Regional Anesthesia and Pain Medicine
 American Society of Retina Specialists
 American Thoracic Society
 American Urological Association
 American Venous Forum
 Association for Clinical Oncology
 Congress of Neurological Surgeons
 Medical Group Management Association
 North American Neuromodulation Society
 North American Spine Society
 Outpatient Endovascular and Interventional Society
 Renal Physicians Association
 Society for Vascular Surgery
 Society of American Gastrointestinal and Endoscopic Surgeons
 Society of Cardiovascular Computed Tomography
 Society of Interventional Radiology
 Society of Thoracic Surgeons
 Spine Intervention Society

California Medical Association
Colorado Medical Society
Connecticut State Medical Society
Medical Society of Delaware
Medical Society of the District of Columbia
Florida Medical Association
Medical Association of Georgia
Hawaii Medical Association
Idaho Medical Association
Illinois State Medical Society
Indiana State Medical Association
Kentucky Medical Association
Louisiana State Medical Society
Maine Medical Association
MedChi, The Maryland State Medical Society
Massachusetts Medical Society
Michigan State Medical Society
Minnesota Medical Association
Mississippi State Medical Association
Missouri State Medical Association
Nebraska Medical Association
Medical Society of New Jersey
Medical Society of the State of New York
North Carolina Medical Society
North Dakota Medical Association
Ohio State Medical Association
Oregon Medical Association
Pennsylvania Medical Society
Rhode Island Medical Society
South Carolina Medical Association
Tennessee Medical Association
Texas Medical Association
Utah Medical Association
Vermont Medical Society
Medical Society of Virginia
Washington State Medical Association
Wisconsin Medical Society
Wyoming Medical Society