



September 7, 2022

Rick Watson, DO
Senior Medical Director
Cigna Corporate Headquarters
900 Cottage Grove Road
Bloomfield, CT 06002

Dear Dr. Watson,

On behalf of the American Academy of Family Physicians (AAFP), which represents 127,600 family physicians, residents, and medical students across the nation, I write in response to Cigna's modifier -25 reimbursement policy announcement. Cigna originally intended to implement the policy on August 13, 2022, but has delayed until a date yet to be determined. The AAFP calls on Cigna to not only delay but to reconsider its approach to implementation of this policy due to the negative consequences this new policy would have on all physicians, including those currently adhering to appropriate coding guidelines, if implemented as originally described.

Cigna's announcement indicates this new policy was the "result of a recent review" but did not indicate the findings that would merit this new policy. We believe that it is important to disclose the findings from your review given the significant impact this new policy will have on all physicians billing modifier -25 with evaluation and management (E&M) codes 99212-99215 when a minor procedure is billed. The AAFP supports more targeted approaches that are based on valid data and updated as behavior changes over time rather than penalizing all physicians.

Cigna's policy would also require the documentation to be submitted via fax. Cigna should incorporate other non-manual technologies that allow physicians to upload their documentation online in all instances where medical records are requested to reprocess claims.

The AAFP supports the appropriate use of modifiers. Our Coding and Payment [policy](#) supports both physicians and health plans abiding by the principles of Current Procedural Terminology (CPT). As such, the AAFP believes office visits appended with modifier -25 should only be reported with procedures when appropriately indicated. The AAFP regularly educates physicians on the use of CPT codes and proper modifier usage. The AAFP believes it would be more appropriate for Cigna to identify physician outliers and implement policies that ensure the correct use of modifier -25 for those physicians and/or practices. These steps should include notification and education as a first step before more significant penalties or actions are taken.

Indiscriminately applying policies, such as this policy in its original form, add to the administrative burden faced by physicians and their staff and drain practice resources to care for patients. The AAFP looks forward to Cigna's response. For additional information or follow-

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up, please contact Brennan Cantrell, Practice and Payment Strategist, at the AAFP, at 913-906-6172 or by email at bcantrell@aafp.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie E. Quinn". The signature is written in a cursive style with a large initial 'S'.

Stephanie E. Quinn,
Senior Vice President, Advocacy, Practice Advancement and Policy

Cc: Brennan Cantrell, Practice and Payment Strategist