



May 31, 2023

Re: Reimbursement policy update: Implementation delay for evaluation and management codes billed with modifier 25 and minor procedures

We pride ourselves in working closely with our provider partners and seek to implement policies and solutions that help protect our customers' out-of-pocket costs, while not unduly burdening providers.

You were recently informed of an update we planned to make that would require the submission of office notes with claims submitted with evaluation and management (E&M) Current Procedural Terminology (CPT®) codes 99212, 99213, 99214, and 99215 and modifier 25 when a minor surgical procedure is billed. The E&M line would be administratively denied unless we received documentation to support that a significant and separately identifiable service was performed.

Delaying the implementation of this policy update

Since announcing this policy update, provider feedback indicated that while there is general consensus that modifier 25 is often inappropriately billed, the process we proposed for how to submit office notes requires further assessment. Additionally, national medical societies committed to work with us to educate their membership on the inappropriate billing of modifier 25. As a result, we are currently reevaluating this reimbursement policy update, which will delay implementation.

What this means to you

- The Modifier 25 - Significant, Separately Identifiable Evaluation and Management Service by the Same Physician on the Same Day of the Procedure or Other Service reimbursement policy update ~~will no longer be effective for dates of service on or after May 25, 2023.~~
- We will look to implement this policy when we can optimize the provider experience and perform additional provider education.
- We will communicate a new implementation date and additional details at a later time.

We appreciate your partnership and patience and look forward to working more collaboratively with our provider partners, medical associations, and their membership to ensure that modifier 25 is used appropriately and in alignment with national guidelines and industry standards.

Sincerely,

A handwritten signature in black ink that reads "JB Kessel MD".

Julie B. Kessel, MD
Medical Officer for Coverage Policy
Clinical Performance & Quality Organization