

July 17, 2025

Amy Flaster, MD, MBA
Senior Vice President
Chief Medical Officer
Cigna
900 Cottage Grove Rd
Bloomfield, CT 06002

Dr. Flaster,

On behalf of the more than 7,700 U.S. rheumatologists and rheumatology health professionals represented by the American College of Rheumatology (ACR), I am reaching out regarding Cigna's policy on Evaluation and Management Coding and Accuracy, effective October 1, 2025. The ACR is very concerned about the impact of this policy on rheumatology practices, specifically the potential for arbitrary and unwarranted reimbursement cuts and increased administrative burden on practices to appeal inappropriately downcoded claims.

Rheumatic diseases are complex and may present with a myriad of comorbid conditions. Given this high level of complexity of both the presenting symptoms and the requisite medications used to manage these diseases, it is anticipated that a high percentage of rheumatology evaluation and management (E/M) visits would be level 4 or level 5.

The ACR opposes automatic or unwarranted downcoding of claims and we strongly disagree that simply reducing the E/M CPT code by a single level would result in improved claims accuracy. If Cigna personnel suspect a claim has been inappropriately coded, then they should request and review relevant medical records prior to adjusting the claim and decreasing reimbursement. The burden to appeal a claim that was correctly coded to begin with should not rest on the rheumatology practice. Furthermore, all claims that are subject to downcoding should be reviewed by a professional coder. The ACR recognizes that health insurance payers are increasingly using artificial intelligence to deny or limit care without direct oversight of each individual claim, and we reject these attempts to inappropriately limit patient access.

The ACR supports the appropriate coding and billing of claims, including claims for E/M services, through numerous member resources and ongoing educational opportunities. ACR has even partnered with the American Academy of Professional Coders (AAPC) to offer the Certified Rheumatology Coder certification which provides a higher knowledge of coding and billing compliance for physicians, advanced practice providers, and rheumatology practice staff. If Cigna data indicates inappropriate billing of rheumatology E/M claims, then we strongly urge you to first address these concerns through direct provider outreach and education. Widespread and arbitrary downcoding is not appropriate and threatens access to care for Cigna patients.

We appreciate your review of these concerns and urge Cigna to rescind the policy on Evaluation and Management Coding and Accuracy in favor of a more measured approach that starts with provider outreach and education. We request the opportunity to speak with you further about this important issue and its impact on rheumatology practices and patients. Please contact Meredith Strozier, ACR Director of Practice Advocacy at mstrozier@rheumatology.org or (404) 633-3777 with any questions or to arrange a follow-up call.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Feely, MD". The signature is stylized and cursive.

Michael Feely, MD
Chair, ACR Insurance Subcommittee