



David Cordani, CEO
Cigna Corporate Headquarters
900 Cottage Grove Road
Bloomfield, CT 06002

RE: Request for Reconsideration of Reimbursement Policy #R49

Lynn Lucas-Fehm, MD, JD
President

Mr. Cordani,

Arvind R. Cavale, MD, FACE, FCPP, PCEO
President Elect

On behalf of the Pennsylvania Medical Society (PAMED), which represents more than 13,000 physicians, residents, and medical student members across the Commonwealth, I am writing to express serious concerns regarding Reimbursement Policy #R49, scheduled to take effect on October 1, 2025.

Edward Balaban, DO, FACP, FASCO
Vice President

John R. Mantione, MD
Board Chair

PAMED recognizes and supports the importance of Evaluation and Management (E/M) auditing to ensure accurate billing practices. However, there is concern about the unintended consequences this policy may have on physicians who are correctly following the American Medical Association's CPT E/M guidelines.

Ashley Wilkerson, MD
Secretary

Martin P. Raniowski, MA, FCPP, CAE
CEO/Executive Vice President

Under the proposed changes, physicians adhering to these established standards may be forced to dedicate substantial resources toward appealing denied claims and submitting additional documentation to justify their original coding. This process is likely to result in delayed payments, increased administrative burden, and ultimately, revenue loss for physicians who are already in compliance with national coding standards.

400 Winding Creek Blvd.
Mechanicsburg, PA 17050-1885

In addition, this policy will increase the volume of appeals submitted to Cigna, further straining administrative resources on both sides. Most importantly, this creates inefficiencies that detract from time and focus that should be directed toward patient care.

Membership Inquiries
(800) 228-7823

We believe that physicians who are accurately billing in accordance with AMA CPT E/M guidelines should not be subject to unnecessary disruptions in their revenue cycle. Therefore, PAMED respectfully requests that you re-evaluate Policy #R49 and consider a solution that does not penalize physicians who are in compliance with the current nationally recognized coding standards.

Tel: (800) 228-7823
Fax: (855) 943-3285
www.pamedsoc.org

I welcome the opportunity to engage in further discussion on this matter and work collaboratively toward a resolution that supports efficient, high-quality patient care and fair reimbursement practices. Please feel free to contact Martin Raniowski, CEO at mraniowski@pamedsoc.org with any additional questions or to arrange for further discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Lucas-Fehm". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Lynn Lucas-Fehm, MD