

October 8, 2025

Amy Flaster, MD
Chief Medical Officer
Cigna Healthcare (Rtg code – 3W.710)
900 Cottage Grove Road
Bloomfield, CT 06152

Dear Dr. Flaster,

On behalf of the American College of Osteopathic Family Physicians (ACOFP), I write to voice our concern regarding Cigna's new Evaluation and Management (E/M) Coding and Accuracy policy (R49), which went into effect on October 1, 2025. The new reimbursement policy will permit Cigna to adjust Current Procedural Terminology (CPT) codes 99204-99205, 99214-99215, and 99244-99245 to "a single level lower when the encounter criteria on the claim does not support the higher-level E/M CPT code reported." While we acknowledge Cigna's decision to pause implementation of the policy pending review by the California Department of Managed Health Care (DMHC), we urge Cigna to rescind this downcoding policy altogether, as it creates significant risk to patient care, administrative efficiency, and appropriate physician reimbursement.

ACOFP is the professional organization representing more than 26,000 practicing osteopathic family physicians, residents, and students throughout the United States who are deeply committed to advancing our nation's health by improving health care delivery and outcomes and ensuring that patients have access to high-quality care.

We are concerned about the lack of transparency associated with Cigna's new downcoding policy as Cigna failed to disclose the specific criteria or algorithms it intends to use to make downcoding decisions. Without transparency, providers will be unable to reasonably anticipate or prevent adjustments, which could result in unwarranted payment reductions to primary care physicians. In addition, physician practices will be forced to undertake expensive appeals for routine claims due to automatic downcoding, leading to payment delays. These delays could be especially harmful for small, independent, and solo practices who are already grappling with workforce shortages and increasing operational expenses.

Furthermore, ambiguity surrounding Cigna's downcoding policies will lead physicians to default to lower coding levels, potentially undermining clinical precision and adversely affecting patient care. Osteopathic family physicians, who emphasize whole-person and preventive care, likely will face reduced patient interaction time due to the increased administrative burden these policies impose. Finally, Cigna's harmful new downcoding policy appears to be targeted ostensibly at a small percentage of physicians, yet Cigna has implemented an overly broad approach instead of a more constructive approach such as targeted education for the certain physicians.

For the aforementioned reasons, we urge Cigna to rescind its downcoding policy given the broader implications it will have on patient access to care, administrative efficiency, and physician payment. We intend to keep Cigna apprised of these adverse impacts as this misguided policy continues to be implemented.



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Should you need any additional information or if you have any questions, please feel free to contact ACOFP at advocacy@acofp.org or (847) 952-5100.

Sincerely,

A handwritten signature in black ink that reads "Gautam J. Desai, DO, FACOFP dist.".

Gautam J. Desai, DO, FACOFP *dist.*
ACOF, President