MSMS
MICHIGAN STATE MEDICAL SOCIETY

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February 19, 2026

James D. Grant, MD, MBA
Senior Vice President and Chief Medical Officer
Amy Milewski, MD, MBA
Vice President of Clinical Partnerships and Associate Chief Medical Officer
Blue Cross Blue Shield of Michigan
600 E. Lafayette
Detroit, MI 48226

Dear Doctor Grant and Doctor Milewski,

The undersigned state and national associations, specialty societies, Physician Organizations, and a large multi-specialty group practice within a statewide healthcare system represent thousands of physicians throughout the state of Michigan. On behalf of our members, we are writing to share our significant concerns with Blue Cross Blue Shield of Michigan's scheduled reimbursement policy change regarding evaluation and management (E/M) services billed with modifier 25. The February edition of The Record provided notice that beginning on May 1, 2026, BCBSM will begin reducing reimbursement by 50 percent for non-preventive E/M services, CPT Codes 99202–99205 and 99212–99215, appended with modifier 25 when performed on the same day as a procedure with a 0, 10, or 90 day global surgical period.

This reduction raises serious concerns for patient access, care efficiency, and the sustainability of community-based medical practices in Michigan. As described in The Record, the 50 percent reduction is automatic and applies regardless of documentation demonstrating that the E/M service was separately identifiable and medically necessary. Accordingly, our respective organizations request that BCBSM rescind implementation of this policy.

BCBSM characterization of this policy as a "coding accuracy" initiative based on perceived overlap in economic components is flawed and has been refuted in other states where this change has been tried and later rescinded, as well as in a November 20, 2017, letter from the American Medical Association (AMA) to Anthem Blue Cross and in an April 27, 2018, letter to the Blue Cross Blue Shield Association. In both letters, the AMA addresses how this represents a misunderstanding of the code valuation process and contradicted the Centers for Medicare & Medicaid Services (CMS) and the Resource Based Relative Value Scale Update Committee (RUC) which already adjusts reimbursement for procedure codes typically reported with E/M codes to account for any overlapping costs. Because the RUC has already adjusted code valuations to account for overlap, this proposed policy change to reduce reimbursements by an additional 50 percent for E/M codes reported with modifier 25 when reported with a global surgical period constitutes a duplicative and unjustified further reduction in physician payment for legitimate, necessary services.

Our members are not asking for more reimbursement, just to be paid appropriately for services that are actually provided, documented, and medically necessary. Additionally, we are advocating for the retention of BCBSM's current policy, which supports efficient, single-visit care; thereby reducing unnecessary return visits, related costs, and inconveniences to patients while helping to keep total healthcare costs under control.

Finally, according to data from the AMA, inflation-adjusted physician reimbursement has steadily declined over the past two decades, particularly affecting independent and small-group private practices. These practices often provide the most accessible, affordable, and timely care for patients, and they operate on narrow margins and are disproportionately harmed the most by automatic E/M payment cuts.

We strongly urge Blue Cross Blue Shield of Michigan to rescind this policy before it takes effect. If you have any questions or want to discuss this issue in more detail, please do not hesitate to reach out to any or all of our respective organizations.

Sincerely,

Amit Ghose, MD, President
Michigan State Medical Society

Brian Peters, Chief Executive Officer
Michigan Health & Hospital Association

Bashar Yalldo, MD, FAAFP, President
Michigan Academy of Family Physicians

Megan Acho, MD, President
Michigan Academy of Sleep Medicine

Kelly O'Shea, MD, President
Michigan Allergy & Asthma Society

Marc Moisi, MD, President
Michigan Association of Neuro Surgeons

Joseph Fakhoury, MD, FAAP, President
Michigan Chapter – American Academy of Pediatrics

Ali Moiin, MD, President
Michigan Dermatological Society

Brian Kirschner, MD, President
Michigan Neurological Association

Amar Majjhoo, MD, President
Michigan Rheumatism Society

Diana Silas, DO, President
Michigan Orthopaedic Society

Eleanor Chan, MD, President
Michigan Otolaryngologic Society

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