

August 8, 2023

**Sent via Email**

Ms. Susan Ridzon  
Executive Director, Vermont HealthFirst

Re: Modifier 25

Dear Susan:

I want to give you an update on the action items I outlined in my May 22 letter to you. I hope they reassure you that we are making positive forward progress.

- 1. We have reviewed editing results year-to-date along with 2022 claims submissions. We will remove providers from the edit, if they had fewer than 100 qualifying claims in 2022, and they have no anomalous claims, e.g. outliers, associated with the modifier.**

Effective August 27, 2023, 401 provider organizations (single practitioners and group practices) will have the modifier 25 edit turned off for a year. We will evaluate their billing patterns and the use of the modifier every year to see if any changes need to be made.

- 2. We are open to exploring alternate ways to obtain the records, for example utilizing access to a provider's EMR.**

For a large provider we have set up a file transfer process that will allow them to send records quickly and securely. Other providers are using fax and secure email.

- 3. We are evaluating the option to have certified coders perform in-office audits of a statistically valid number of provider records for claims submitted with modifier 25 attached to an E&M. If the documentation supports the use of modifier 25 in 80% or more of the claims, then we can remove the provider from the edit for a year. Annual audits would be performed to determine if the edit can remain off or not.**

We want a full eight months of data on the edit, including the clinical review results of submitted reconsiderations, before we determine if there are additional providers for whom the edit can be turned off. If there are high volume providers for whom a decision still cannot be made, then we will have certified coders audit sample charts to see if the pass rate is 80% or above. If it is, then we will turn off the edit, again for a year, for affected providers. We also will provide education on appropriate documentation for those practices that do not pass.

**4. We will set up a series of webinars for providers and office staff on the correct use of modifier 25 and associated documentation requirements.**

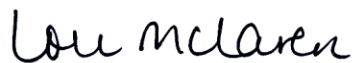
We are working with a highly regarded coder trainer on setting up webinars about the use of modifier 25 and how to document for it. We hope to record a webinar and post it to our provider web site for future reference.

**5. We are looking at ways to enhance the remark codes that are on the payment voucher, when an edit is triggered, so that providers have more information available to them.**

We have made significant progress on developing reporting to help the providers. We have expanded the remark codes on the payment vouchers, but there is limited opportunity there. We have developed reports that can be run at the provider level that offer more detailed explanations of how an edit was applied. The report, currently run upon request, has been met with approval. The long-term goal is to automate the report generation monthly and upload it to the provider resource center, allowing providers to access the reports without requesting them. We are just beginning this work, so I do not have a go-live date for you.

Thank you.

Sincerely,



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Director, Provider Services

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