



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
LANSING

ELIZABETH HERTEL  
DIRECTOR

July 8, 2025

**TO:** Interested Party

**RE:** Consultation Summary Project Number 2501–Dental - Medicare Physician Fee Schedule Final Rule 2025 – Dental Service Billing Requirements

Thank you for your comment(s) to the Health Services Administration relative to Project Number 2501-Dental. Your comment(s) has been considered in the preparation of the final publication, a copy of which is attached for your information.

Responses to specific comments are addressed below.

**Comment:** What is a KX modifier?

**Response:** The KX modifier is a medical billing code that indicates the following, "Specific therapy services are medically necessary."

**Comment:** Does this policy mean for any claim submitted we must include documentation?

**Response:** This policy applies specifically to Medicare enrolled providers only and Medicare/Medicaid dually eligible beneficiaries when there is a dental service provided that is believed to be inextricably linked to a covered medical service under Medicare Part A or B.

**Comment:** Commenters requested clarification on the use of the institutional claim (837I) for implementation of Proposed Policy 2501-Dental.

**Response:** In alignment with The Centers for Medicare & Medicaid Services (CMS) guidelines, policy language has been updated to include the institutional claim (837I).

**Comment:** Comments received requested a delay in policy implementation outlined in Proposed Policy Number 2501-Dental. Commenters indicated that following a meeting with stakeholders, including dental software vendors and billing clearinghouses involved in processing dental claims, there was concern these entities are not prepared for implementation.

**Response:** The Michigan Department of Health and Human Services (MDHHS) recognizes the concerns expressed in regard to Proposed Policy Number 2501-Dental. MDHHS did consult with CMS regarding the comments submitted and CMS expressed they received similar feedback prior to issuing the 2025 Medicare Physician Fee Schedule Final Rule. CMS clarified this will have minimal impact on dental systems. This will impact only Medicare enrolled dental providers when submitting secondary claims aligning with policy requirements. Additionally, MDHHS Claims Department has confirmed our system is capable of taking in the required data.

Thank you for your inquiry. We trust that previous responses addressed the concerns and questions noted. If you wish to comment further, send your comments to Elizabeth Pitts at [pittse@michigan.gov](mailto:pittse@michigan.gov).

Sincerely,

A handwritten signature in black ink that reads "Meghan Groen". The signature is fluid and cursive, with the first name "Meghan" and last name "Groen" clearly legible.

Meghan Groen, Chief Deputy Director  
Health Services