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To: Executive Directors  
State Medical Associations  
County Medical Societies  
National Medical Specialty Societies

From: Michael D. Maves, MD, MBA 

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Subject: HHS and AMA Actions on H1N1 Vaccine Administration Coding and Payment

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Senior officials managing the H1N1 public health emergency have reached out to the AMA and physician community for assistance in removing any barriers to a successful H1N1 immunization campaign. As a first step, CMS developed two new H1N1 codes for the Medicare program:

- G9141—Influenza A (H1N1) immunization administration (includes the physician counseling the patient/family)
- G9142—Influenza A (H1N1) vaccine, any route of administration

CMS indicated that the H1N1 vaccine will be provided free of charge to immunizers. For H1N1 vaccine administration, Medicare will pay the same rate as it does for administering seasonal flu vaccine, about \$21. In addition, for both seasonal flu and H1N1 vaccine administration, Medicare will pay 100% and patients will not be charged any co-pays or deductibles. HHS has also asked private insurers to provide first-dollar coverage of H1N1 vaccine administration.

AMA policy calls for the AMA to work to ensure that private insurance plans pay at least the Medicare rates for administering ACIP-recommended vaccines. Accordingly, the AMA wrote to Secretary Sebelius on September 15 and asked HHS to encourage private sector payers to adopt the Medicare payment rate for H1N1 vaccine administration as a floor on private sector rates.

This week, HHS Assistant Secretary for Preparedness and Response Nicole Lurie, MD, MSPH, wrote the AMA asking that the CPT Editorial Panel move expeditiously to facilitate the availability of CPT codes specific to H1N1 vaccine product and its administration so that private payers could quickly program the codes into their systems. Dr. Lurie's letter indicated that HHS was moving forward with an early vaccination campaign and that it considered the AMA's efforts "monumental to that success." In response, the CPT Panel moved extremely rapidly and established an H1N1-specific immunization administration code and revised existing code 90663 for specificity to H1N1 product:

- 90470—H1N1 immunization administration (intramuscular, intranasal), including counseling when performed
- 90663—Influenza virus vaccine, pandemic formulation, H1N1

At the request of CMS, the AAP, AAFP, ACOG and ACP will present information to the RUC regarding the resources required to provide the H1N1 immunization in a physician's office. The RUC will consider this information next week at a previously scheduled meeting and forward recommendations to CMS on Monday, October 5.

AMA staff is finalizing a detailed communications campaign utilizing all available channels to ensure that information related to these codes is widely communicated. The AMA will provide updates on any new payment information related to this immunization campaign as soon as it becomes available.