

November 1, 2021

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services

Dear Secretary Becerra and Administrator Brooks-LaSure:

On behalf of the Group of Six, which represents more than 600,000 frontline physicians, we write to request your urgent assistance to increase COVID-19 vaccine uptake by ensuring clinicians are appropriately paid for vaccine counseling for beneficiaries of Medicaid and Medicare.

The members of our six organizations provide the majority of care to our nation's children, pregnant women, adults and elderly for a full range of physical, mental and substance use conditions. Each day, our physician members provide health care to patients in communities large and small, urban and rural, rich and poor, and experience firsthand the ways that Medicare and Medicaid policies can ameliorate or worsen inequities in health care access and outcomes.

Our members have been on the frontlines of the COVID-19 pandemic and they have played an enormous role in achieving the progress we have collectively made in vaccinating Americans against COVID-19. However, much of this work has been uncompensated since, in general, Medicare and Medicaid do not pay clinicians for counseling patients about vaccines if that counseling is not part of a visit where the vaccine is administered.

There are important reasons why counseling often occurs outside the context of vaccine administration. For some patients and families, deciding to receive a COVID-19 vaccine requires considerable and repeated conversations with their trusted clinician to fully address their questions and concerns. Patients often only agree to vaccinate themselves or their child after several counseling sessions. In addition, physicians have and will be called upon to counsel patients about vaccines offered in other settings outside the medical home, such as pharmacies and schools. Inability to receive counseling payment for vaccines given at other sites has been particularly problematic in jurisdictions that have not prioritized vaccine access in primary care clinics.

Addressing this issue is especially important now as we enter a new phase in the pandemic. As COVID-19 vaccination rates increase, the remaining population of unvaccinated individuals may have increased levels of hesitancy or concerns about the vaccines and will likely require multiple and lengthy discussions with their trusted physicians before agreeing to receive the COVID-19 vaccine. In addition, as we near the availability of a COVID-19 vaccine for younger children, we anticipate that parents will have a lot of questions, requiring physicians to provide additional counseling. Physicians are now also providing counseling about COVID-19 vaccine boosters and additional doses.

In order to promote more widespread uptake of vaccines and move our country closer to the goal of community immunity for COVID-19, **the federal government should ensure that all clinicians participating in Medicaid and Medicare can be adequately paid for counseling their patients about COVID-19 vaccines, even if the vaccine is not administered in conjunction with the counseling.** We ask

you to take immediate action to make payment available for COVID-19 vaccine counseling via CPT code 99401 (preventative medicine counseling and/or risk factor reduction intervention) with or without face-to-face patient contact in Medicare and to do the same for Medicaid by covering payment for this code by state Medicaid programs with a 100 percent federal medical assistance percentage. Covering standalone vaccine counseling will ensure that physicians are appropriately compensated for the time they spend supporting their patients in making important immunization decisions. Thank you for your urgent attention to this issue.

Sincerely,

American Academy of Family Physicians
American Academy of Pediatrics
American College of Obstetricians and Gynecologists
American College of Physicians
American Osteopathic Association
American Psychiatric Association