Coding and COVID-19 Vaccines

PRESENTERS

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CPT® VACCINE CODING CAUCUS
The AMA’s Strategic Work

Leading the charge to confront chronic disease and public health crises
- Helping Americans achieve no new preventable cases of Type 2 Diabetes, all adults meeting their blood pressure goals, and an end to the opioid epidemic

Driving the future of medicine
- Reimagining training, education, and lifelong learning and promoting innovation to tackle the biggest challenges in health care

Removing obstacles that interfere with patient care
- Making the patient-physician relationship more valued than paperwork, technology an asset and not a burden, and physician burnout a thing of the past
Stay informed with AMA resources

The AMA COVID-19 Resource Center provides science- and evidence-based perspectives from AMA’s physician leaders and subject matter experts to keep physicians and their practices informed. The page is updated as the pandemic situation develops.

[ama-assn.org/covid19]

Find your COVID-19 Vaccine CPT Codes is an AMA tool designed to help determine the appropriate CPT code combination for the type and dose of vaccine being used.

[ama-assn.org/find-covid-19-vaccine-codes]


The AMA Center for Health Equity was created to embed health equity across the organization so that health equity becomes part of the practice, process, action, innovation and organizational performance and outcomes. Find out what the AMA is doing to promote health equity for all Americans.

[ama-assn.org/delivering-care/health-equity]

The AMA Digital Health Implementation Playbook offers key steps, best practices and resources to accelerate the adoption and scale of digital health solutions.

[ama-assn.org/digital-health-playbook]

The AMA quick guide to telemedicine in practice was created to support physicians and practices in expediting the implementation of telemedicine, so care can continue to be provided to those who need it most.

[ama-assn.org/telemedicine-guide]
And now, it’s polling time!

When you see the poll appear in the slide window, click on the answer, then click SUBMIT.
AMA COVID-19 Response and COVID Vaccine Update

Mira Irons, MD
Chief Health and Science Officer
Group Vice President, Health and Science
AMERICAN MEDICAL ASSOCIATION
COVID-19 : AMA Response

• Collaborative and coordinated effort across all business units at the AMA
• Focus
  • Provide physicians evidence-based knowledge and guidelines to effectively care for their patients
    • Real-time and evidence based
    • Vaccines: FDA and CDC webinars, Physician and patient FAQs
  • Significant Advocacy efforts at all levels
    • Vaccines: Engagement with Biden administration regarding vaccine development, physician and patient education, distribution, CPT coding, and reimbursement for vaccine administration
• Informed by physicians, students, and external stakeholders in the health care environment
• Mirrors the timeline of the pandemic in the United States
Distribution Channels

- AMA COVID-19 Resource Center
  - Housed on the AMA public website
  - Evolving clinical information and guidance
  - Ethics-use cases and Journal of Ethics podcasts
  - AMA Guides and Resources—>40 subject specific guides
  - Health Equity Resource Guide
  - Vaccine website
- EdHub: COVID-19 site
- JAMA Network
- Resource Center daily video updates, interviews
- Social media
SAFELY ACCELERATING THE VACCINE DEVELOPMENT PROCESS

All research and analysis aspects of clinical trials are maintained in the accelerated process.

- **RESEARCH AND PRE-CLINICAL TRIALS**
- **PHASE 1 CLINICAL TRIALS**
- **PHASE 2 CLINICAL TRIALS**
- **PHASE 3 CLINICAL TRIALS**
- **FDA AND CDC REVIEWS**
- **DISTRIBUTION**
- **MANUFACTURING**
- **MONITORING AND REPORTING OF THE VACCINE’S LONG-TERM SAFETY AND EFFICACY**

Vaccines developed with accelerated processes still must pass all the same safety and efficacy hurdles as typically developed vaccines.

Large-scale clinical trials allow for more rapid collection and earlier analysis of safety and efficacy data.

Clinical development, process development, and manufacturing scale-up can be substantially accelerated by running all phases in parallel.
Operation Warp Speed COVID-19 Vaccines

OWS leverages the federal government and private industry to accelerate vaccine development

**FDA-Authorized**
- Moderna
- Pfizer/BioNTech
- Janssen/J and J

**Late-stage trials**
- AstraZeneca
- Novavax
- Sanofi/GSK
Lessons Learned and Still Learning

• Complexity of providing care for a previously unknown serious condition with a continually evolving story
• Spotlight on health equity issues in our healthcare system
• Transformative changes in clinical practice and medical education that occurred in very short periods of time
• Cumulative effects of shortages of PPE, inadequate laboratory testing, and lack of specific treatment for severely affected patients
• Intensified effects of burn-out and moral distress
• Influence of the media and pre-print servers
• Importance of science, evidence, and data
• Need for better data systems and interoperability
• Cumulative effects of underfunding the public health system in the United States
• Tremendous impact of the scientific community in developing several safe and effective vaccines
SARS-CoV-2 Vaccine Coding—Understanding the new code structure

Jordan G. Pritzker, MD, MBA, FACOG

Co-Chair

CPT® VACCINE CODING CAUCUS
Unique Issues Associated with COVID Vaccine Coding Requests

• Initial request for codes were not from the manufacturer
• Request for unique codes to meet the tracking needs of the CDC, FDA, CMS built into the codes
• Pressure to have codes ready when EUA is granted to potential vaccines
• Create a unique VCC process that could rapidly respond to code generation needs
• Established a collaborative relationship with CDC
Scope of Vaccine Coding Request

• Create Vaccine-specific CPT® codes
  • Purpose: Efficiently track individual SARS-CoV-2 vaccines
• Issues to Address:
  • Precedent in CPT vaccine section is to not explicitly use manufacturer names in the code descriptor
  • AMA has worked to validate data elements that will help to clinically differentiate each vaccine
    • Efforts built upon as needed as new vaccines are added to the code set
  • Request that the CPT codes be made available prior to public availability of vaccine
    • Systems need time to ingest the codes into their systems
Scope of Vaccine Administration Coding Request

- Create Vaccine-specific CPT® vaccine administration code
- Scope of request:
  - Vaccine-specific; AND
  - Granular to the scheduled dose (ie, separate codes for initial, subsequent doses)
- Rationale:
  - Many vaccines are provided with zero patient cost share and hence, the vaccine CPT code would not be billed on the claim
  - Additionally, multiple different vaccines will require a multi-dose schedule, which may not have the vaccine product code listed on the claim for subsequent doses
  - There may also be cost differentials between different vaccines in terms of handling and storing requirements
Vaccine Coding Caucus (VCC)

• **Charge:**
  • To bring a unified voice to the CPT® process on vaccine issues, to review all vaccine and immunization-related code change applications and existing codes, and to make non-binding recommendations on these matters to the Panel.

• **Membership:**
  • 6 voting members
    • 4 voting At-Large members (national medical specialties)
    • 2 co-chairs (Panel member and/or current CPT Advisor)
Vaccine Coding Caucus (VCC)

• Co-Chairs
  • Judith A. O'Connell, DO, MHA, FAAO
  • Jordan G. Pritzker, MD, MBA, FACOG

• Membership:
  • Sam Church, MD – American Academy of Family Physicians (AAFP)
  • Renee Slade, MD – American Academy of Pediatrics (AAP)
  • Ron Devine, MD – Infectious Diseases Society of America (IDSA)
  • Jill Olmstead, MSN (American Nurses Association (ANA))
COVID Vaccine Recommendations Pathway

AMA staff receive validated data on vaccines from manufacturers and CDC

VCC meets with COVID vaccine manufacturers

VCC makes recommendations to the Panel/Executive Committee (EC) for consideration

Panel/EC meets virtually to review recommendations, establishes codes

AMA staff publish Panel/EC approved codes to website
CPT® Vaccine Code Structure Generator Template—Current vs. SARS-CoV-2

**Current example: Influenza**

<table>
<thead>
<tr>
<th>Target Condition</th>
<th>Valency</th>
<th>Formulation</th>
<th>Preservatives</th>
<th>Dose Volume</th>
<th>Route</th>
</tr>
</thead>
<tbody>
<tr>
<td>Influenza virus vaccine,</td>
<td>trivalent (IIV3), split virus,</td>
<td>preservative free,</td>
<td>0.5 mL dosage,</td>
<td>for intramuscular use</td>
<td></td>
</tr>
</tbody>
</table>

**Coronavirus (SARS CoV-2) Vaccine Codes (proposed)**

- 913XX  
  Severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (coronavirus disease [COVID-19]) vaccine, XXXvalent, vaccine formulation, vaccine type detail, adjuvanted?, preservative free?, K.XX mg, XXX, XXX, XXX, for intramuscular use
**CPT® Code Structure - Coronavirus (SARS – CoV-2) Vaccine and Vaccine Administration Codes**

**Vaccine**
913XX code series

**Vaccine Administration**
Code Construction:
- Alpha-Numeric: 4 digit + “A”
- Digits 1-3: specific vaccine
- Digit 4: Dose

**Example:**

913X1  
Specific Vaccine

0X11A  
1st (or single) dose  
Administration Code
# 91300  Severe acute respiratory syndrome coronavirus 2 (SARSCoV-2) (coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 30 mcg/0.3mL dosage, diluent reconstituted, for intramuscular use
   ▶ (Report 91300 with administration codes 0001A, 0002A) ▲

# 91301  Severe acute respiratory syndrome coronavirus 2 (SARSCoV-2) (coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 100 mcg/0.5mL dosage, for intramuscular use
   ▶ (Report 91301 with administration codes 0011A, 0012A) ▲

# 91302  Severe acute respiratory syndrome coronavirus 2 (SARSCoV-2) (coronavirus disease [COVID-19]) vaccine, DNA, spike protein, chimpanzee adenovirus Oxford 1 (ChAdOx1) vector, preservative free, 5x10¹⁰ viral particles/0.5mL dosage, for intramuscular use
   ▶ (Report 91302 with administration codes 0021A, 0022A) ▲

# 91303  Severe acute respiratory syndrome coronavirus 2 (SARSCoV-2) (coronavirus disease [COVID-19]) vaccine, DNA, spike protein, adenovirus type 26 (Ad26) vector, preservative free, 5x10¹⁰ viral particles/0.5mL dosage, for intramuscular use
   ▶ (Report 91303 with administration codes 0031A) ▲
Immunization administration by intramuscular injection of severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 30 mcg/0.3mL dosage, diluent reconstituted; first dose

0002A second dose

(Report 0001A, 0002A for the administration of vaccine 91300)
Clinical Example (91303)
A 33-year-old individual seeks immunization against SARS-CoV-2 to decrease the risk of contracting this disease, consistent with evidence-supported guidelines. The individual is offered and accepts an intramuscular injection of SARS-CoV-2 vaccine for this purpose.

Description of Procedure (91303) The physician or other qualified health care professional (QHP) determines that the SARS-CoV-2 vaccine is appropriate for this patient and dispenses the vaccine according to the dose schedule in the administration code for the SARS-CoV-2 vaccine.

Clinical Example (0031A) A 33-year-old individual seeks immunization against SARS-CoV-2 to decrease the risk of contracting this disease, consistent with evidence-supported guidelines. The individual is offered and accepts an intramuscular injection of SARS-CoV-2 vaccine for this purpose.

Description of Procedure (0031A) The physician or other QHP reviews the patient’s chart to confirm that vaccination to decrease the risk of COVID-19 is indicated. Counsel the patient on the benefits and risks of vaccination to decrease the risk of COVID-19 and obtain consent. Administer the single dose of the COVID-19 vaccine by intramuscular injection in the upper arm. Monitor the patient for any adverse reaction. Update the patient’s immunization record (and registry when applicable) to reflect the vaccine administered.
CPT® Code Guidelines—Coronavirus (SARS – CoV-2) Vaccine and Vaccine Administration Codes

Medicine
Immunization Administration for Vaccines/Toxoids

► Report vaccine immunization administration codes (90460, 90461, 90471-90474, 0001A, 0002A, 0011A, 0012A, 0021A, 0022A, 0031A) in addition to the vaccine and toxoid code(s) (90476-90749, 91300, 91301, 91302, 91303).

Report codes 90460 and 90461 only when the physician or qualified health care professional provides face-to-face counseling of the patient/family during the administration of a vaccine other than when performed for severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (coronavirus disease [COVID-19]) vaccines. For immunization administration of any vaccine, other than SARS-CoV-2 (coronavirus disease [COVID-19]) vaccines, that is not accompanied by face-to-face physician or qualified health care professional counseling to the patient/family/guardian or for administration of vaccines to patients over 18 years of age, report 90471-90474. (See also Instructions for Use of the CPT Codebook for definition of reporting qualifications.)
Medicine
Immunization Administration for Vaccines/Toxoids

Report 0001A, 0002A, 0011A, 0012A, 0021A, 0022A, 0031A for immunization administration of SARS-CoV-2 (coronavirus disease [COVID-19]) vaccines only. Each administration code is specific to each individual vaccine product (eg, 91300, 91301, 91302, 91303), the dosage schedule (eg, first dose, second dose), and counseling, when performed. The appropriate administration code is chosen based on the type of vaccine and the specific dose number the patient receives in the schedule. For example, 0012A is reported for the second dose of vaccine 91301. Do not report 90460-90474 for the administration of SARS-CoV-2 (coronavirus disease [COVID-19]) vaccines. Codes related to SARS-CoV-2 (coronavirus disease [COVID-19]) vaccine administration are listed in Appendix Q, with their associated vaccine code descriptors, vaccine administration codes, vaccine manufacturer, vaccine name(s), National Drug Code (NDC) Labeler Product ID, and interval between doses. In order to report these codes, the vaccine must fulfill the code descriptor and must be the vaccine represented by the manufacturer and vaccine name listed in Appendix Q.
CPT® Code Guidelines—Coronavirus (SARS – CoV-2) Vaccine and Vaccine Administration Codes

Medicine
Immunization Administration for Vaccines/Toxoids

►If a significant separately identifiable Evaluation and Management service (eg, new or established patient office or other outpatient services [99202-99215], office or other outpatient consultations [99241-99245], emergency department services [99281-99285], preventive medicine services [99381-99429]) is performed, the appropriate E/M service code should be reported in addition to the vaccine and toxoid administration codes.

A component refers to all antigens in a vaccine that prevent disease(s) caused by one organism (90460 and 90461). Multi-valent antigens or multiple serotypes of antigens against a single organism are considered a single component of vaccines. Combination vaccines are those vaccines that contain multiple vaccine components. Conjugates or adjuvants contained in vaccines are not considered to be component parts of the vaccine as defined above. (For allergy testing, see 95004 et seq) (For skin testing of bacterial, viral, fungal extracts, see 86485-86580) (For therapeutic or diagnostic injections, see 96372- 96379)
Overview of CPT® Codes—To Date (Pfizer & Moderna)

- November 5, 2020 – Panel held public Zoom call
  - Approved 6 new COVID-19 vaccine product and vaccine administration codes
    - **Two product codes** – one for each of Pfizer’s and Moderna’s vaccines
    - **Four administration codes** – two codes (first dose, second dose) for each of manufacturer’s vaccines
  - Approved Appendix Q -
    - Quick guide for proper reporting of the COVID-19 vaccine codes
  - Published on AMA website: Tues, Nov 10
Overview of CPT® Codes—To Date (AstraZeneca)

- December 14, 2020 – Executive Committee (EC) call
  - Approved 3 new COVID-19 vaccine product and vaccine administration codes
    - **One product code** – one for the AstraZeneca vaccine
    - **Two administration codes** – two codes (first dose, second dose) for the AZ vaccine.
  - Updates to Appendix Q
  - Published on AMA website: Thurs, Dec 17
Overview of CPT® Codes—To Date (Janssen)

- January 14, 2020 – Executive Committee (EC) Call
  - Approved 2 new codes for the COVID-19 vaccine product and vaccine administration
    - **One product code** – one for the Janssen vaccine
    - **One administration code** – one code (single dose) for the Janssen vaccine administration.
  - Updates to Appendix Q
  - Published on AMA website: Tues, Jan 19
Overview of CPT® Codes—Understanding Publication vs. Effective

**Publish**
- Published to the AMA Website
- Available early for systems to upload codes
- Occurs within a few days of Panel/EC approval

**Effective**
- Effective upon receiving Emergency Use Authorization or approval from the FDA
- Dependent on FDA review/approval process
## Manufacturer Information Crosslink (CPT® Appendix Q)

<table>
<thead>
<tr>
<th>Vaccine Code/Descriptor</th>
<th>Vaccine Administration Code(s)</th>
<th>Vaccine Manufacturer</th>
<th>Vaccine Name(s)</th>
<th>NDC 10/ NDC 11 Labeler Product ID (vial)</th>
<th>Dosing Interval</th>
</tr>
</thead>
<tbody>
<tr>
<td>91300</td>
<td>0001A (1&lt;sup&gt;st&lt;/sup&gt; Dose) 0002A (2&lt;sup&gt;nd&lt;/sup&gt; Dose)</td>
<td>Pfizer, Inc</td>
<td>Pfizer-BioNTech COVID-19 Vaccine</td>
<td>59267-1000-1 59267-1000-01</td>
<td>21 Days</td>
</tr>
<tr>
<td>91301</td>
<td>0011A (1&lt;sup&gt;st&lt;/sup&gt; Dose) 0012A (2&lt;sup&gt;nd&lt;/sup&gt; Dose)</td>
<td>Moderna, Inc</td>
<td>Moderna COVID-19 Vaccine</td>
<td>80777-273-10 80777-0273-10</td>
<td>28 Days</td>
</tr>
<tr>
<td>91302</td>
<td>0021A (1&lt;sup&gt;st&lt;/sup&gt; Dose) 0022A (2&lt;sup&gt;nd&lt;/sup&gt; Dose)</td>
<td>AstraZeneca, Plc</td>
<td>AstraZeneca COVID-19 Vaccine</td>
<td>0310-1222-10 00310-1222-10</td>
<td>28 Days</td>
</tr>
<tr>
<td>91303</td>
<td>0031A (1&lt;sup&gt;st&lt;/sup&gt; Dose)</td>
<td>Janssen</td>
<td>Janssen COVID-19 Vaccine</td>
<td>59676-580-05 59676-0580-05</td>
<td>N/A</td>
</tr>
</tbody>
</table>

- Connect vaccine to specific manufacturer and Vaccine name
- Reduce administrative burden of identifying appropriate subsequent dose
Upcoming Vaccines

• Novavax vaccine
  • Phase 3 trial in the US and Mexico, PREVENT-19, is ongoing and has enrolled over 16,000 participants to date.
  • Potential timeline to complete enrollment of 30,000 patients is first half of Feb, 2021.
AMA Website

- Overall COVID-19-related CPT codes
  - Includes all lab diagnostic tests, PE supply in a PHE and vaccine codes
- COVID-19 Vaccine-specific CPT codes
AMA Resources

Category I vaccine descriptors
- CPT code descriptors (Long, Medium, Short)

Vaccine resources
- Appendix Q—Printable/Streamlined version of Appendix Q

CPT® Assistant provides guidance for new codes
- CPT Assistant provides fact sheets for coding guidance for new SARS-CoV-2 (COVID-19)-related vaccine codes.
  - Codes, descriptors and purpose
  - Clinical examples
  - Description of the procedures
  - FAQs

AMA Resources

• Download a Microsoft Excel spreadsheet of all the COVID-19-related CPT codes

COVID-19 lab testing & vaccine CPT codes
Access a file with the new CPT codes for testing and vaccine products and vaccine administrations.

AMA Resources

- Interactive Tool to help you find your COVID-19 Vaccine CPT codes

Find COVID-19 vaccine CPT® codes

Use this AMA tool to determine the appropriate CPT code combination for the type and dose of vaccine being used.

Questions?
Physicians’ powerful ally in patient care