Families want their children to see the pediatrician as often as they need to, but they don’t want the inconvenience of traveling back and forth to the doctor’s office more than necessary. Unfortunately, a technical change made by the Centers for Medicare and Medicaid Services (CMS) National Correct Coding Initiative (NCCI) discourages immunizing children at well-child visits, which can force families to visit the doctor on multiple days.

NCCI’s technical change disallows billing for immunization administration in conjunction with well-child and other preventive services provided on the same day without the use of a modifier. While many states allow the use of modifiers, some do not. Further, even if use of a modifier is allowed by a state, pediatricians conduct so many well-child visits and immunize children so often that they will be subject to multiple audits by using the modifier.

The edit upends decades of work to encourage pediatricians to provide immunizations and well-child services during a single visit. Immunizations are a critical component of child disease prevention, and 80% of immunizations are provided in private practices. The U.S. immunization system is fragile, and changes that can decrease immunization rates should be avoided.

Pediatricians across the country report that the change is undermining care for children.

- In a survey administered by the AAP in February 2013, pediatricians were asked whether they were experiencing problems with billing for immunizations and well-child visits on the same day. More than 300 responses were received from 39 states, DC and Puerto Rico in one week.
- Pediatricians reported the most problems with private payers (78.4%), but problems with Medicaid managed care plans were a close second (60.3%). In addition, pediatricians reported that other Medicaid managed care plans were creating difficulties (36.6%) and that other private payers were also adopting the edit (39.2%).

AAP Action

- AAP President, Thomas K. McInerny, MD, FAAP, wrote to the Medical Director of the National Correct Coding Initiative on January 28, 2013, urging immediate action.
- Dr. McInerny then wrote another letter regarding this issue to Department of Health and Human Services Secretary Kathleen Sebelius and the White House, on February 7, 2013 requesting emergency action.
- The AAP has notified its members to use the modifier, even though pediatricians will be audited.
- CMS sent an alert to all state Medicaid agencies allowing each to deactivate the NCCI edit for the entirety of 2013, retroactive to January 1. The AAP subsequently urged its state chapters to advocate at the state level for this result.

Please work with your state AAP chapter to deactivate the preventive service/immunization edit. For assistance with state advocacy on edit deactivation, please contact the AAP Division of State Government Affairs at stgov@aap.org.