



## Vaccine Counseling when a Vaccine is not Administered

Infectious Diseases providers are among the strongest advocates for vaccination and frequently serve as trusted resources for patients, especially those who are medically complex or uncertain about their need for vaccines. Vaccine discussions can be particularly time-intensive when patients are hesitant, often requiring detailed counseling to address concerns and support informed decision-making.

Historically, the time required for these discussions has not been directly reimbursable, creating a barrier to providing thorough counseling. Effective January 1, 2026, new Current Procedural Terminology (CPT) codes were introduced to address this gap. These codes allow providers to receive reimbursement for vaccine counseling when a vaccine is not administered. However, these codes are not currently recognized by the Centers for Medicare & Medicaid Services (CMS) and may not be reimbursed under Medicare.

### What is Vaccine Counseling?

Vaccine counseling is a patient-centered discussion between a healthcare provider and patient (or caregiver) that supports informed decision-making about immunizations. It involves assessing needs, addressing concerns, and providing clear, evidence-based recommendations.

### Goals of Vaccine Counseling

- Ensure patients understand risks vs. benefits
- Address vaccine hesitancy with empathy and facts
- Increase vaccine confidence and uptake
- Support informed consent

### Eligible CPT Codes

90482–90484

### Criteria for Use:

These codes may be used when all of the following conditions are met:

- Counseling is provided by a qualified healthcare professional (MD, DO, NP, or PA; *not* a nurse)
- When the vaccine counseled was not accepted and administered the same day
- Documentation includes:
  - The counseling provided
  - The specific vaccine(s) discussed
  - Exact time spent counseling
  - The outcome of the discussion

### Billing Considerations

#### Stand-Alone Codes

- CPT codes 90482–90484 are stand-alone codes



- They must be documented and billed separately, unlike add-on codes

### Same-Day Billing with E/M Services

These codes may be billed on the same day as an Evaluation & Management (E/M) service if:

- The counseling is separate and distinct from the primary visit
- The E/M code includes modifier 25
- The time spent counseling is included

Providers are not required to report CPT codes 90482–90484 when vaccine counseling is provided; if the counseling is performed as part of an E/M service and does not meet the requirements for separate reporting, it may be included in the E/M service. The counseling should still be documented in the medical record to support the services provided and the medical decision-making.

### Example:

A provider evaluates and manages osteomyelitis during an office visit and also provides influenza vaccine counseling.

- Osteomyelitis management is documented separately
- Vaccine counseling is clearly distinct
- Billing may include both an E/M code (with modifier 25) and a vaccine counseling code (90482–90484)

### Reimbursement for these codes:

- **Medicare:** Assigned status “I” (not reimbursed)
- **Medicaid:** Coverage depends on individual state fee schedules
- **Private insurers:** Some reports of reimbursement, but not consistent

| CPT Code | Time Spent Counseling | Work RVUs (wRVUs) |
|----------|-----------------------|-------------------|
| 90482    | 3 – 10 minutes        | 0.24              |
| 90483    | 10 – 20 minutes       | 0.50              |
| 90484    | >20 minutes           | 0.75              |

### Important Rules

- Do NOT use if the vaccine is administered (for that vaccine)
- You CAN use if:
  - One vaccine is given
  - A different vaccine is only discussed
- Only one counseling code per day, even if multiple vaccines are discussed

### References

1. **American Medical Association (AMA).** *CPT® 2026 Code Set – Immunization Administration (90482–90484).*
2. **AMA CPT® Assistant (March 2026).** *Reporting Immunization Counseling (90482–90484).*
3. **AAPC (American Academy of Professional Coders).** *CPT® Codes 90482–90484.*
4. **American Academy of Pediatrics (AAP).** *Immunization Coding & Billing Guidance.*



5. **Coding Guidance (CPP / Vaccine Buying Group, 2026).**
6. **Haugen Consulting Group.** *New 2026 CPT Codes for Vaccine Counseling.*
7. **Washington Academy of Family Physicians (2026).** *Vaccine Counseling Coding Update.*
8. **AAPC Coding Newsletter (2026).** *Use These New Immunization Counseling Codes in Your Practice.*