



October 3, 2025

SUBMITTED ELECTRONICALLY

Anne Docimo, MD
Chief Medical Officer
UnitedHealthcare
P.O. Box 1459
Minneapolis, MN 55440-1459

RE: UnitedHealthcare's Policy Concerning Allergen Immunotherapy (CPT Code 95165)

Dear Dr. Docimo:

The American College of Allergy, Asthma and Immunology and Advocacy Council represent more than 6,000 allergists/immunologists and health care professionals across the United States, and the more than 40 million patients who suffer from allergic, respiratory, and immunologic disorders. Allergic conditions are among the most prevalent chronic health issues in our communities. We are writing about an urgent situation that has come to our attention. UHC is implementing a policy that denies claims for build-up doses under CPT 95165. **We respectfully request that UHC reconsider and revise this policy to allow appropriate coverage and reimbursement for build-up dose preparation.** As described in detail below, build-up doses are an integral part of allergen immunotherapy.

Notably, all Medicare Administrative Contractors ("MACs") support coverage for build-up doses under CPT code 95165. Five MACs—CGS Administrators, LLC; National Government Services; Noridian Healthcare Solutions, LLC; Palmetto GBA, LLC; and Wisconsin Physicians Service Health Insurance Corp.—have already publicly affirmed that build-up and maintenance dosing are considered equivalent for coverage purposes. Effective October 26, 2025, their local coverage articles ("LCAs") will state:¹

There is no differentiation between initiation therapy and maintenance therapy. However, claims for maintenance allergen immunotherapy require the EJ modifier.

Diluted doses for the purpose of "build up" and maintenance dosing are the same, as long as reasonable and necessary and within CMS National Correct Coding Initiative (NCCI) Medically Unlikely Edits (MUEs).

¹ CGS's [A59981](#) Billing and Coding: Allergen Immunotherapy (AIT) with Subcutaneous Immunotherapy (SCIT); NGS's [A59973](#) Billing and Coding: Allergen Immunotherapy (AIT) with Subcutaneous Immunotherapy (SCIT); Noridian's [A59976](#) and [A59978](#) Billing and Coding: Allergen Immunotherapy (AIT) with Subcutaneous Immunotherapy (SCIT); Palmetto's [A59971](#) Billing and Coding: Allergen Immunotherapy (AIT) with Subcutaneous Immunotherapy (SCIT); WPS's [A60276](#) Billing and Coding: Allergen Immunotherapy (AIT) with Subcutaneous Immunotherapy (SCIT).



In addition, the remaining two MACs—First Coast Service Options and Novitas Solutions—have communicated to ACAAI that “if reasonable and necessary, Novitas Solutions and First Coast Service Options will cover and pay for allergy immunotherapy build-up doses; however, we still indicate that we do not guarantee payment or provide/require prior authorization for these services.” *Attachment A*.

Given this widespread consensus across all seven MACs, we respectfully request that UHC align its policy accordingly. Denying coverage for build-up doses under CPT 95165 is inconsistent with these standards and fails to recognize the clinical necessity and equivalent physician work involved. We appreciate your consideration and request that UHC update its coverage policies to ensure fair and consistent reimbursement for this essential component of allergen immunotherapy.

With respect to UHC’s Medicare Advantage plans, UHC is required by law to adopt applicable local coverage policies. Medicare Advantage plans must offer the same level of care—under the same coverage rules—to their patients as traditional Medicare Parts A and B. Medicare regulations similarly mandate that Medicare Advantage plans comply with all national coverage determinations (“NCDs”), applicable local coverage determinations (“LCDs”), and Medicare guidance documents unless those materials are superseded by regulations specific to Medicare Advantage.² Accordingly, UHC must comply with the aforementioned coverage policies on CPT code 95165.

Allergen Immunotherapy – Build-Up Phase

Allergen immunotherapy requires that patients receive a series of allergen injections of increasing strengths over several months. This is known as the “build-up” phase of treatment, during which patients receive increasing concentrations of antigen generally up to three times per week. To prevent anaphylaxis during build-up, doses are smaller and may have to be adjusted. Build-up vials are expressed as volume per volume (“v/v”) from the maintenance concentrate. This phase typically lasts three to six months, after which, the patient transitions to maintenance therapy. Maintenance therapy means that the patient has reached the highest concentration of antigens and under most situations this is the dosage the patient will receive for the remainder of the time they receive allergy immunotherapy. Injections are typically administered every two to four weeks.

Build-up doses require the same amount of physician cognitive work and the same amount of supervision of preparation of vials. Neither CPT nor the American Medical Association’s Relative Value Update Committee (“RUC”) discriminate between build-up doses and maintenance doses in the definition of CPT Code 95165. Each dose of 95165 contains the same amount of physician work. This is in recognition of the physician cognitive work involved in determining contents, concentration, and dosage schedule of allergen immunotherapy, as well as supervision of vial preparation.

Therefore, we request that UHC cover and reimburse the preparation of build-up doses of antigens for allergen immunotherapy under CPT code 95165.

² 42 C.F.R. § 422.101(b)(2).



We would appreciate the opportunity to meet with you to discuss this letter and answer any questions. We also stand ready to offer guidance to UHC on issues affecting allergy practice, to help ensure that claims are aligned with medical necessity. Please consider us a resource and partner to UHC. If you have any questions or to schedule a meeting, please contact Dr. Allen Meadows.

Sincerely,

James M. Tracy, DO, FACAAI
President, ACAAI

Travis A. Miller, MD, FACAAI
Chair, Advocacy Council

Novitas Solutions and First Coast Service Options

On Mon, Sep 8, 2025 at 11:03 AM
Silvis, Jennifer wrote:

Hi Dr. Meadows and Jarrod,

I apologize for any confusion in my response. In regard to First Coast Service Options Lead Executive Contractor Medical Director (CMD) Dr. Anitra Graves' reply in this email trail, on July 28, 2025, she defined the build-up phase and maintenance phase as separate due to the reasonable and necessary basis not being the same. Thus, documentation would be needed to differentiate the services provided in regard to the CPT billed. The policy is written that if reasonable and necessary, Novitas Solutions and First Coast Service Options will cover and pay for allergy immunotherapy build-up doses; however, we still indicate that we do not guarantee payment or provide/require prior authorization for these services. Our statement regarding not guaranteeing payment is a means to address unforeseeable situations/scenarios, e.g., billing errors (like a typo regarding units), as well as other potential edits that may apply and potentially do not allow the whole claim or certain services on the claim to process and/or pay, e.g., CMS edit regarding patient information.

In addition, the other portion was just to address that we cannot tell providers what CPTs/HCPCS to apply to their claims to have their claim process for payment. As CPT/HCPCS codes are proprietary to the AMA.

If you still would like to meet to discuss this policy again, please let us know.

Sincerely,

Jennifer Silvis
CMD Research Analyst, Medical Affairs
[Novitas Solutions, Inc.](#) and [First Coast Service Options](#)

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