



AMERICAN COLLEGE OF ALLERGY, ASTHMA & IMMUNOLOGY

ADVOCACY COUNCIL ALERT

December 20, 2024

Leadership of the Advocacy Council met with Noridian Healthcare Solutions (Noridian) - a Medicare Administrative Contractor (MAC) for practices in Alaska, American Samoa, Arizona, California, Guam, Hawaii, Idaho, Montana, Nevada, North Dakota, Northern Mariana Islands, Oregon, South Dakota, Utah, Washington (state), and Wyoming - and is pleased to announce that **Noridian has acknowledged that for purposes of CPT 95165, build-up doses are treated the same as maintenance doses and are paid for if reasonable and necessary.** *In other words, Noridian may cover and pay for allergy immunotherapy build-up doses.*

As we all know, allergen immunotherapy, administered through subcutaneous injections, is a proven clinically effective treatment for individuals with allergic rhinitis and allergic asthma. We explained, as we did with the [Palmetto MAC](#), that when a patient begins immunotherapy, he or she typically begins with build-up doses, and their concentration gradually increases over time. CPT code 95165 describes “professional services for the supervision of preparation and provision of antigens for allergen immunotherapy; single or multiple antigens (specify number of doses).” The Advocacy Council is in receipt of an email from Noridian recognizing that, with regard to CPT code 95165, “Noridian treats diluted doses for the purposes of build-up and maintenance dosing the same, as long as reasonable and necessary.”

However, it is important to note that Medicare has assigned medically unlikely edits (MUEs) of 30 units per day for CPT code 95165. The MUEs are the maximum unit(s) of service that could be reported for a single beneficiary on the same date of service for the vast majority of appropriately reported claims. Claims in excess of the MUE number of units are considered “medically unlikely.” Also, Medicare continues to define a dose as 1ml, unlike the CPT definition.

Noridian’s policy applies only to practices in states for which Noridian is the MAC. Allergy practices that submit claims to MACs other than Noridian and Palmetto may not rely on this policy to bill for build-up doses.

The Advocacy Council is working to get similar acknowledgments from the other MACs and will keep you informed of our progress. This work is part of our [Payer Education Campaign \(PEC\)](#) that focuses on halting allergen immunotherapy audits and claims denials.

We must acknowledge the important work done in this effort in partnership with the Advocacy Council by Ned DeLosier of The Allergy, Asthma and Sinus Center and PME Communication, as well as John Herzog of Kimball Associates. We are grateful to Senator Marsha Blackburn and Senator Bill Cassidy, MD, for their assistance with CMS in this effort. In additions, we'd like to thank the California Medical Association for their assistance.

IMPORTANT: *The information contained herein is provided for educational purposes only and should not be construed or relied upon as legal advice. If legal advice is required, you should seek the advice of your legal counsel.*

The Advocacy Council – ADVOCATING FOR ALLERGISTS AND THEIR PATIENTS.