



National Adult and Influenza Immunization Summit

February 10, 2026

Dear Colleagues:

The National Adult and Influenza Immunization Summit (NAIIS) is writing to raise an urgent operational issue affecting access to COVID-19 and other vaccination services across multiple Medicare Advantage, commercial, and Medicaid health plans.

We have received multiple reports from local public health departments, primary care practices, and other frontline vaccinators that claims for vaccine administration are being denied due to outdated National Correct Coding Initiative (NCCI) Procedure-to-Procedure (PTP) edits that have already been corrected by the Centers for Medicare & Medicaid Services (CMS). While CMS has issued replacement files to withdraw these edits retroactively, many commercial and Medicaid payers appear not to have downloaded or implemented the corrected NCCI files, resulting in ongoing and inappropriate claims denials.

We kindly request your assistance in alerting members to the CMS-issued NCCI replacement files and working with members to ensure appropriate information is shared with providers.

Background on the CMS correction

Effective July 1, 2025, CMS mistakenly implemented NCCI PTP edits between:

- Column One: 90480 (COVID-19 vaccine administration), and
- Column Two: G0008 (Influenza vaccine administration), G0009 (Pneumococcal vaccine administration), and G0010 (Hepatitis B vaccine administration).

Following the implementation, there were [immediate reports](#) from providers of claim denials when both a COVID-19 and another vaccine were administered. On October 14, 2025, CMS issued [replacement NCCI files for the 4th quarter of 2025](#) withdrawing these edits retroactively to July 1, 2025, recognizing that these services are appropriately billable when administered during the same encounter. CMS has posted the replacement files on the Medicaid NCCI Edit Files webpage, and state Medicaid agencies can access them through the [Regional Information Sharing System \(RISSNET\)](#).

Impact on providers and patients

Despite this CMS correction, providers continue to experience denials because payer systems are still applying the withdrawn edits. These denials:

- Create financial barriers for public health departments and primary care practices administering vaccines;
- Disincentivize co-administration of COVID-19 and influenza vaccines, contrary to public health best practices;
- Increase administrative burden through appeals and resubmissions; and

- Ultimately delay or limit patient access to recommended immunizations.

This issue is particularly concerning as we work to sustain adult immunization infrastructure and ensure access for older adults and individuals at increased risk of severe respiratory illness.

Request to the health insurance community

We respectfully request that AHIP and NAIC:

1. Alert member plans to the CMS-issued NCCI replacement files and the retroactive withdrawal of these edits;
2. Encourage immediate implementation of the corrected NCCI files across commercial and Medicaid programs;
3. Urge plans to reprocess affected claims and suspend denials related to these withdrawn edits; and
4. Promote clear communication to providers confirming that co-administration of COVID-19 and influenza vaccines is appropriately reimbursable.

NAIIS stands ready to collaborate with payers, regulators, and provider organizations to resolve this issue quickly and ensure that payment systems align with CMS policy and public health goals.

Thank you for your leadership and attention to this important access issue. Please do not hesitate to contact us if additional information would be helpful.

Sincerely,

A handwritten signature in black ink, appearing to read 'Litjen' followed by a stylized flourish.

Litjen (L.J.) Tan, MS, PhD
Co-Chair, National Adult and Influenza Immunization Summit