

April 6, 2023

Donna Pickett, MPH, RHIA
ICD-10 Coordination and Maintenance Committee
National Center for Health Statistics
3311 Toledo Road
Hyattsville, Maryland 20782

Dear Ms. Pickett:

The American Health Information Management Association (AHIMA) respectfully submits the following comments on proposed ICD-10-CM Addenda modifications presented at the March ICD-10 Coordination and Maintenance (C&M) Committee meeting and being considered for October 1, 2023 implementation.

AHIMA is a global nonprofit association of health information (HI) professionals. AHIMA represents professionals who work with health data for more than one billion patient visits each year. AHIMA's mission of empowering people to impact health drives our members and credentialed HI professionals to ensure that health information is accurate, complete, and available to patients and providers. Our leaders work at the intersection of healthcare, technology, and business, and are found in data integrity and information privacy job functions worldwide.

We support the proposed ICD-10-CM Addenda modifications presented for October 1, 2023 implementation.

Additionally, we recommend that the following proposed Addenda changes presented for October 1, 2024 implementation be considered for implementation on October 1, 2023. These changes represent error corrections or significant clarifications that we believe should become effective earlier than October 1, 2024 in order to facilitate proper coding and improve the quality of coded data.

Tabular Modifications That Should Become Effective October 1, 2023 Instead of October 1, 2024

G93.4 Other and unspecified encephalopathy

Delete ~~Excludes1: alcoholic encephalopathy (G31.2)~~
 ~~encephalopathy in diseases classified elsewhere (G94)~~
 ~~hypertensive encephalopathy (I67.4)~~

Add Excludes2: alcoholic encephalopathy (G31.2)
 encephalopathy in diseases classified elsewhere (G94)
 hypertensive encephalopathy (I67.4)

H26.21 Cataract with neovascularization

Revise Code also, if applicable, associated condition, such as:
 chronic iridocyclitis (H20.1-)

K59.0 Constipation

Delete Excludes1: fecal impaction (K56.41)
 ~~incomplete defecation (R15.0)~~

Add Excludes2: incomplete defecation (R15.0)

P28.5 Respiratory failure of newborn

Delete ~~Excludes1: respiratory arrest of newborn (P28.81)~~
Delete ~~respiratory distress of newborn (P22.0-)~~

Add Excludes2: respiratory arrest of newborn (P28.81)
Add respiratory distress syndrome of newborn (P22.0)

R41 Other symptoms and signs involving cognitive functions and awareness

Revise Excludes1: dissociative [conversion] disorders (F44.-)
 delirium or acute confusional state with dementia F05
 ~~mild cognitive impairment, so stated~~ mild cognitive impairment of
 uncertain or unknown etiology (G31.84)

S06.3 Focal traumatic brain injury

Delete ~~Excludes1: any condition classifiable to S06.4-S06.6~~

S22 Fracture of rib(s), sternum and thoracic spine

Revise Code first, if applicable, any associated condition such as:
 injury of intrathoracic organ (S27.-)
 spinal cord injury (S24.0-, S24.1-)
Add traumatic hemothorax (S27.1-)
Add traumatic pneumothorax (S27.0)

Add traumatic hemopneumothorax (S27.2)

Index Modifications That Should Become Effective October 1, 2023 Instead of October 1, 2024

Entanglement
- umbilical cord(s) O69.82
Revise - - around neck ~~(with compression) O69.81~~
 - - - with compression O69.1
 - - - without compression O69.81

Hypertension, hypertensive (accelerated) (benign) (essential) (idiopathic) (malignant) (systemic) I10
- complicating
- - childbirth (labor) O16.4
Revise - - - pre-existing ~~O10.92~~ O10.02

 - - pregnancy O16.-
Revise - - - pre-existing ~~O10.91~~ O10.01-

Osteoporosis (female) (male) M81.0
- age-related M81.0
- - with current pathologic fracture M80.00
Revise - - - rib(s) ~~see Osteoporosis, specified site NEC~~ M80.0A

Revise Pneumonitis (acute) (primary) ~~(see also Pneumonia)~~ J98.4
Add - noninfectious J98.4
Add - specified NEC J98.4

Thank you for the opportunity to comment on the proposed ICD-10-CM modifications being considered for an October 1, 2023 effective date. If you have any questions, please feel free to contact Sue Bowman, Senior Director of Coding Policy and Compliance, at (312) 233-1115 or sue.bowman@ahima.org.

Sincerely,



Wylecia Wiggs Harris, PhD, CAE
Chief Executive Officer