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October 5, 2020

VIA ELECTRONIC MAIL

Mady Hue
Centers for Medicare and Medicaid Services
CMM, HAPG, Division of Acute Care
Mail Stop C4-08-06
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Dear Ms. Hue:

The American Health Information Management Association (AHIMA) respectfully submits the following comments on the ICD-10-PCS code proposals presented at the September ICD-10 Coordination and Maintenance (C&M) Committee meeting and being considered for April 1, 2021 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.

ICD-10-PCS Codes Effective August 1, 2020

AHIMA completely agrees with the C&M attendee who recommended that the 2021 ICD-10-PCS code tables and index be updated to include the new ICD-10-PCS codes that became effective on August 1. These code tables and index are relied upon as the comprehensive source of all ICD-10-PCS codes effective for fiscal year 2021, and so the codes that were implemented on August 1 might be missed by code set users or inadvertently omitted from coding products/systems.

Administration of Lifileucel

While AHIMA supports new ICD-10-PCS codes for administration of lifileucel, we do **not** support implementation on April 1, 2021. In order for codes for new technology to be implemented on April 1 rather than October 1, a clear and convincing case for an April 1 implementation must be made. Since the requester intends to submit a New Technology Add-on Payment (NTAP) application for FY 2022 consideration, it is not clear why a new code would be needed before October 1, 2021.

We recommend option 3 presented at the C&M meeting (creation of new codes in section X New Technology, table XW0 Introduction), with implementation of the new codes on October 1, 2021.

Administration of Idecabtagene Vicleucel

While we support new ICD-10-PCS codes for administration of idecabtagene vicleucel (ide-cel), we do **not** support implementation on April 1, 2021. Since the requester intends to submit an NTAP application for FY 2022 consideration, it is not clear why a new code would be needed before October 1, 2021. The presenter indicated an April 1 implementation request is because approval by the Food and Drug Administration (FDA) is anticipated in the first quarter 2021. However, it is unclear why the timing of FDA approval would necessitate implementation of new codes on April 1 when the NTAP, if approved, wouldn't go into effect until October 1.

We recommend option 3 presented at the C&M meeting (creation of new codes in section X New Technology, table XW0 Introduction), with implementation of the new codes on October 1, 2021.

Posterior Dynamic Distraction

While we support new ICD-10-PCS codes in section X, New Technology, to identify the use of a posterior dynamic distraction device, we do **not** support implementation on April 1, 2021. Since the requester intends to submit an NTAP application for FY 2022 consideration, it is not clear why a new code would be needed in April. Therefore, we recommend that new codes be implemented on October 1, 2021.

Thank you for the opportunity to comment on the proposed new ICD-10-PCS codes being considered for April 1, 2021 implementation. If you have any questions, please contact Sue Bowman, Senior Director of Coding Policy and Compliance, at (312) 233-1115 or sue.bowman@ahima.org.

Sincerely,



Dr. Wylecia Wiggs Harris, PhD, CAE
Chief Executive Officer