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October 6, 2023

Mady Hue
Technical Advisor
Centers for Medicare and Medicaid Services
CM/TCPG/DICDRG
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 that are being considered for April 1, 2024 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.

Irreversible Electroporation for Cardiac Ablation

While AHIMA supports Option 2 (creation of new codes in table 025, Destruction of Heart and Great Vessels in the Medical and Surgical section), **we do not support an implementation date of April 1, 2024.** Since the requester intends to submit a New Technology Add-On Payment (NTAP) application for Fiscal Year (FY) 2025 consideration, we do not believe an effective date of April 1 is necessary. We recommend that the new codes described in Option 2 be implemented on October 1, 2024.

Insertion of Palladium-103 Radioactive Implant

We support the creation of a new code for insertion of a Palladium-103 radioactive collagen tile implant in table 00H, Insertion, Central Nervous System and Cranial Nerves. We also support an effective date of April 1, 2024 for the new code.

We recommend that the *ICD-10-PCS Official Guidelines for Coding and Reporting* clarify that no additional code from the Radiation Therapy section to identify the brachytherapy isotope should be assigned since the new Insertion codes would identify the specific isotope.

Electrical Biocapacitance for Assessment of Pressure Injuries

AHIMA does **not** support the creation of a new code for the use of electrical biocapacitance for early assessment of pressure injuries. This procedure is not reported separately for inpatient hospital coding, and the use of this device does not represent a procedure that should be reported with an ICD-10-PCS code.

If CMS decides to create a code for this procedure, we recommend that the root operation Measurement be considered, rather than Monitoring. The description of how the technology is used seems to best fit the definition of Measurement (determining the level of a physiological or physical function at a point in time). Also, since the requester intends to submit an NTAP application for FY 2025 consideration, we do not believe an effective date of April 1 is necessary. Therefore, if a code is created for this procedure, it should be implemented on October 1, 2024.

Administration of ¹³¹I-apamistamab

While AHIMA supports the creation of new codes in section X for ¹³¹I-apamistamab, **we do not support an implementation date of April 1, 2024**. Since the requester intends to submit an NTAP application for FY 2025 consideration, we do not believe an effective date of April 1 is necessary. We recommend that the new codes be implemented on October 1, 2024.

Administration of Talquetamab

While AHIMA supports the creation of new codes in section X for talquetamab, **we do not support an implementation date of April 1, 2024**. Since the requester intends to submit an NTAP application for FY 2025 consideration, we do not believe an effective date of April 1 is necessary. We recommend that the new codes be implemented on October 1, 2024.

Addenda and Key Updates

We support the proposed ICD-10-PCS Index and Table Addenda modifications and Body Part, Device, and Substance Key updates.

Thank you for the opportunity to comment on the proposed ICD-10-PCS modifications that would become effective on April 1, 2024. 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,

A handwritten signature in black ink, appearing to read "Lauren Riplinger", is centered on a light gray rectangular background.

Lauren Riplinger, JD
Chief Public Policy and Impact Officer