



March 31, 2010

VIA ELECTRONIC MAIL

Donna Pickett, MPH, RHIA
Medical Classification Administrator
National Center for Health Statistics
3311 Toledo Road
Room 2402
Hyattsville, Maryland 20782

Dear Ms. Pickett:

The American Health Information Management Association (AHIMA) welcomes the opportunity to provide comments on the proposed diagnosis code modifications presented at the March 9th and 10th ICD-9-CM Coordination and Maintenance (C&M) Committee meeting that are slated for October 2010 implementation. Our comments pertaining to code proposals slated for October 2011 implementation will be sent at a later date.

Influenza with Pneumonia

AHIMA supports the proposal to create new codes for influenza due to avian influenza virus and novel H1N1 influenza virus. However, **we recommend retaining the “use additional code” note** under code 487.0, Influenza with pneumonia, indicating that an additional code should be assigned for the type of pneumonia. **We also recommend that this “use additional code” note for the specific type of pneumonia be added under the proposed new codes 488.01 and 488.11**, Influenza due to identified avian influenza virus with pneumonia, and Influenza due to identified novel H1N1 influenza virus with pneumonia, respectively. We understand that patients with avian influenza virus and novel H1N1 influenza virus may develop bacterial pneumonia, so it is important to capture the specific type of pneumonia.

Fluency Disorder

We support the code proposal for fluency disorder.

Addenda

AHIMA agrees with the proposed Addenda changes slated for implementation in October 2010.

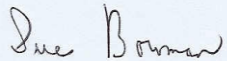
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Inclusion of ICD-10-CM Code Proposals on C&M Agenda

AHIMA recommends that code proposals for additions or modifications to ICD-10-CM (excluding error corrections) be included on the C&M Committee meeting agendas, beginning with the September 2010 C&M Committee meeting.

Thank you for the opportunity to comment on the proposed diagnosis code revisions slated for October 2010 implementation. If you have any questions, please feel free to contact me at (312) 233-1115 or sue.bowman@ahima.org.

Sincerely,

A handwritten signature in cursive script that reads "Sue Bowman". The signature is written in black ink on a light blue rectangular background.

Sue Bowman, RHIA, CCS
Director, Coding Policy and Compliance