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June 12, 2019

Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: **CMS-1718-P**
Mail Stop C4-26-05
Baltimore, Maryland 21244-1850

Dear Administrator Verma:

On behalf of the American Health Information Management Association (AHIMA), I am responding to the Centers for Medicare & Medicaid Services' (CMS) proposed changes to the Medicare Prospective Payment System and Consolidated Billing for Skilled Nursing Facilities (SNF PPS) for Fiscal Year (FY) 2020, as published in the April 25, 2019, issue of the *Federal Register* (CMS-1718-P).

AHIMA is the national nonprofit association of health information management (HIM) professionals. Serving 52 affiliated component state associations including the District of Columbia and Puerto Rico, AHIMA represents more than 103,000 HIM professionals dedicated to promoting and advocating for best practices and effective standards in health information. AHIMA's credentialed and certified HIM members can be found in more than 40 different employer settings in 120 diverse job functions—consistently ensuring that health information is accurate, timely, complete, and available to patients and providers. AHIMA provides leadership through education and workforce development, as well as thought leadership in continuing HIM research and applied management for health information.

Our comments and recommendations on section IV of the SNF PPS proposed rule are below.

IV. Issues Relating to PDPM Implementation (84FR17633)

IV-B – Updating ICD-10 Code Mappings and Lists (84FR17635)

AHIMA fully supports the proposed subregulatory process to update ICD-10-CM codes associated with the Patient Driven Payment Model (PDPM) clinical categories and comorbidity lists in order to ensure consistency with the most current ICD-10-CM medical code set.

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In addition to annual implementation of new and revised ICD-10-CM codes, conventions and instructional notes in the ICD-10-CM code set and the ICD-10-CM Official Guidelines for Coding and Reporting are also updated on October 1 of each year. Compliance with the current ICD-10-CM codes, conventions, instructions, and the Official Guidelines for Coding and Reporting is required for all healthcare settings under the Health Insurance Portability and Accountability Act (HIPAA). **We recommend that CMS ensure any appropriate updates to the ICD-10-CM codes associated with PDPM clinical categories and comorbidity lists that are necessitated by changes to the ICD-10-CM conventions, instructions, or guidelines are included in the proposed subregulatory process.**

We support CMS's proposal to use notice and comment rulemaking to make substantive changes to the ICD-10 code mappings and lists under the PDPM.

We agree that a complete ICD-10 mapping table, including new, discontinued, and modified codes, should be posted on the PDPM website, and that the complete list of ICD-10-CM codes associated with the SNF PDPM clinical categories and comorbidities should be included in the SNF GROUPER documentation.

AHIMA appreciates the opportunity to comment on the proposed modifications to the Medicare SNF PPS for FY 2020. AHIMA is committed to working with CMS and the healthcare industry to improve the quality of healthcare data for reimbursement, quality reporting, and other applied analytics.

If AHIMA can provide any further information, or if there are any questions regarding this letter and its recommendations, 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