



November 14, 2012

VIA ELECTRONIC MAIL

Patricia Brooks, RHIA
Senior Technical Advisor
Centers for Medicare and Medicaid Services
Hospital and Ambulatory Policy Group
Mail Stop C4-08-06
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Dear Ms. Brooks:

The American Health Information Management Association (AHIMA) respectfully submits the following comments on the proposed procedure code modifications presented at the ICD-9-CM Coordination and Maintenance (C&M) Committee meeting held on September 19.

ICD-10-PCS Topics

Expansion of Thoracic Aorta Body Part under Heart and Great Vessels System

AHIMA supports CMS' recommendation to create a new body part value under the Heart and Great Vessels system so that the ascending/aortic arch and descending segments of the thoracic aorta can be separately identified. However, since the presenter indicated that initially devices were only available for the descending thoracic aorta, we recommend that the existing thoracic aorta body part value be revised to specify "descending" and that a new body part value be created for "thoracic aorta, ascending/arch."

Since this proposal does not meet the criteria for creation of new codes during the code set freeze, **AHIMA recommends that no new thoracic aorta body part value be created until October 1, 2015, after the end of the code freeze.**

Temporary Therapeutic Endovascular Occlusion of Vessel

AHIMA supports CMS' proposal to make corrections to the ICD-10-PCS tables to allow proper coding of procedures in which the abdominal aorta is partially occluded via an endovascular balloon catheter. As noted in the proposal, the insertion of the qualifier J-Temporary should have been added to Table 04V rather 02V.

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Since this proposal involves correction of an error, **AHIMA recommends that this change be made prior to the implementation of ICD-10-PCS, during the code freeze**, in order to allow accurate coding of this procedure once ICD-10-PCS is implemented.

Thank you for the opportunity to comment on the proposed procedure code revisions. 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".

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