



April 5, 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 March 5.

ICD-9-CM Topics

Administration of Fidaxomicin

AHIMA agrees with CMS' recommendation **not** to create a new code for administration of fidaxomicin. It is not appropriate to capture the administration of oral medications in ICD-9-CM. This code set is intended to capture procedures, and oral medication administration is not a procedure. Additionally, administration of oral medications does not meet the Uniform Hospital Discharge Data Set definition of procedures to be reported.

Injection or Infusion of Glucarpidase

AHIMA supports the creation of a new code to capture injection or infusion of glucarpidase and believes this code proposal fits within the "new technology" criteria for creating new codes during the partial code freeze. If there are other drugs that would fall in the same category as glucarpidase, we recommend that the code title be broad enough to encompass all drugs in this drug category. If there are no other drugs in the same category, either available now or likely to become available during the remaining life of ICD-9-CM, then it would be appropriate to limit the use of the new code to the one drug.

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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 black ink that reads "Sue Bowman". The signature is written in a cursive style with a large initial "S" and "B".

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