



November 10, 2011

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 14.

ICD-9-CM Proposals

Electromagnetic Navigation Bronchoscopy

AHIMA does not support the creation of unique ICD-9-CM codes for procedures that involve the use of an electromagnetic tip tracked instrument. This procedure was described during the presentation and in the agenda packet as an aid to bronchoscopy for the purpose of better visualizing and accessing certain types of pulmonary nodules, and we do not believe this level of procedural granularity is appropriate in ICD-9-CM or ICD-10-PCS. This procedure can be adequately described with existing ICD-9-CM and ICD-10-PCS procedure codes. Therefore, **we agree with CMS' recommendation not to create new codes and to continue using existing codes.** However, if new codes are ultimately approved for this procedure, they should be implemented in ICD-10-PCS only (not in ICD-9-CM), and only after the partial code freeze has ended.

ICD-10-PCS Proposals

We support the creation of ICD-10-PCS values to differentiate between nonautologous tissue of human and non-human origin for the root operation

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Supplement in the Anatomical Regions, Urinary and Female Reproductive body systems. We believe that implementation of this code proposal can wait until October 1, 2014 and does not need to occur during the code freeze period.

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, RHIA, CCS
Director, Coding Policy and Compliance