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October 3, 2016

VIA ELECTRONIC MAIL

Donna Pickett, MPH, RHIA
ICD-10 Coordination and Maintenance Committee
National Center for Health Statistics
3311 Toledo Road
Hyattsville, Maryland 20782

Dear Ms. Pickett:

The American Health Information Management Association (AHIMA) respectfully submits the following comments on the proposed ICD-10-CM code modifications presented at the ICD-10 Coordination and Maintenance (C&M) Committee meeting held on September 13-14 and requested for April 2017 implementation.

Amyotrophic Lateral Sclerosis (ALS)

AHIMA **opposes** April 1, 2017 implementation of new codes for primary lateral sclerosis, familial motor neuron disease, and progressive spinal muscle dystrophy. These codes do not meet the criteria for April 1 implementation, as they do not represent new technology or new diseases.

We support implementation of these codes on October 1, 2017.

Zika-Related Newborn Conditions

We support implementation of new Zika-related codes on April 1, 2017. While the Zika infection is not technically a new disease, its widespread expansion and emergence as a serious public health threat are new.

We recommend the inclusion of instructional notes to clarify the distinctions between proposed codes P00.21, Newborn affected by maternal infection with Zika virus, and P35.4, Congenital Zika virus infection. We are concerned that there may be confusion as to the clinical circumstances pertaining to the intended use of each of these codes, including whether or not they can be reported together or are intended to represent mutually exclusive Zika-related conditions in newborns. Confusion regarding how or when these codes should be used may lead to inconsistent health data.

As was noted during the C&M meeting, “(suspected to be)” should be stricken from code P00.29, as that phrase is no longer part of the codes in category P00, Newborn affected by maternal conditions that may be unrelated to present pregnancy.

Thank you for the opportunity to comment on these ICD-10-CM code proposals. 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, flowing style.

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