



CODEWRITE

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On the CC List: Antimicrobial Resistance Z-Codes

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Centers for Medicare and Medicaid Services (CMS) has added certain antimicrobial drug resistance ICD-10-CM codes to the complication/comorbidity (CC) list, effective with discharges on or after October 1, 2019.

Additionally, CMS is finalizing an alternative inpatient new technology add-on payment pathway for antimicrobial products. This add-on is being established in consideration of concerns related to antimicrobial resistance. Details about this payment pathway can be found in the Fiscal Year (FY) 2020 Medicare Hospital Inpatient Prospective Payment System (IPPS) and Long Term Acute Care Hospital (LTCH) Prospective Payment System Final Rule (II.H.8. and II.H.9).¹

This article will focus on the ICD-10-CM coding of infections resistant to antimicrobial drugs.

Clinical Information

“Antimicrobial agents” is defined as “the drugs, chemicals, or other substances that either kill, inactivate, or slow the growth of microbes including bacteria, viruses, fungi and parasites.”²

Antibiotics and other antimicrobial agents have been used for decades to fight infections with great success. Unfortunately, resistance to these substances has emerged making it difficult to treat infections caused by certain bacteria, viruses, and fungi. Bacterial infections such as *Staphylococcus aureus*, *Enterococcus*, and *Escherichia coli* can be difficult to treat if resistant to antibiotics. Other diseases such as tuberculosis and malaria are also becoming more difficult to treat due to antimicrobial resistance. When resistance to a drug develops, that drug becomes ineffective. Resistance to antimicrobial agents not only means the infection is untreated, but it also means the chance of spreading that infection to others increases. Because of the threat that this poses to global public health this has become a concern nationally and internationally. Countries across the world are developing action plans to reduce the emergence and spread of antimicrobial resistance.

Seventy-five codes were added to the CC List for fiscal year (FY) 2020, and 18 of those 75 codes are from category Z16 Resistance to antimicrobial drugs.³

Additionally, the following codes are already on the MCC List:⁴

- A41.02 Sepsis due to Methicillin resistant *Staphylococcus aureus*
- J15.212 Pneumonia due to Methicillin resistant *Staphylococcus aureus*

The following codes do not appear on the CC List or the MCC List but are still very important to report if they meet criteria for reporting:

- A49.02 Methicillin resistant *Staphylococcus aureus* infection, unspecified site
- B95.62 Methicillin resistant *Staphylococcus aureus* infection as the cause of diseases classified elsewhere
- Z22.322 Carrier or suspected carrier of Methicillin resistant *Staphylococcus aureus*

Official Guidelines Involved

ICD-10-CM Official Guidelines for Coding and Reporting explains the use of category Z16, Resistance to antimicrobial drugs. The guidelines also provide specific instructions on the selection and sequencing of Methicillin Resistant *Staphylococcus aureus* (MRSA) codes.

ICD-10-CM guideline I.C.21.c.3 states that the codes from ICD-10-CM category Z16 indicate that a patient has a condition that is resistant to antimicrobial drug treatment. The guidelines instruct the coding professional to sequence the infection code first.⁵

ICD-10-CM guideline I.C.1.c stresses the importance of identifying infections that are documented as antibiotic resistant. In some cases, the infection code includes information on specific antimicrobial resistance. One such example is ICD-10-CM code A41.02, Sepsis due to Methicillin resistant *Staphylococcus aureus*. In those cases, a

code from category Z16 would not be added. If the infection code does not identify drug resistance, assign an additional code from category Z16 for infections described as drug resistant.⁶

ICD-10-CM guideline I.C.1.e discusses codes that have been created for MRSA infections.⁷

Coding Scenario

Please note the scenario described below depicts the code results of one experienced coding professional. This is not intended to represent official coding advice or official sequencing instruction but is only intended to illustrate how documentation impacts code assignment.

An 83-year-old male is seen for urinary tract infection due to Vancomycin-resistant Enterococcus (VRE).

ICD-10-CM codes

N39.0 Urinary tract infection, site not specified

B95.2 Enterococcus as the cause of diseases classified elsewhere

Z16.21 Resistance to vancomycin

Index

Infection

-- urinary (tract) N39.0

Infection

--bacterial

---- as cause of disease classified elsewhere

----- Enterococcus B95.2

Resistance

-- organism(s)

---- to

----- drug

----- vancomycin Z16.21

Tabular List

An instructional note with code N39.0 says to use additional code (B95-B97), to identify infectious agent.

An instructional note for Chapter 1 where B95.2 is classified says to use additional code to identify resistance to antimicrobial drugs (Z16.-).

An instructional note with category Z16 says to code first the infection.

NOTES

1. CMS. 2019. FY 2020 Hospital Inpatient Prospective Payment System (IPPS) Final Rule.

<https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AcuteInpatientPPS/index.html>

2. Centers for Disease Control and Prevention (CDC). 2017. "antimicrobial agents." Antibiotic/Antimicrobial Resistance Glossary. Reviewed September 25, 2017. Accessed August 13, 2019. <https://www.cdc.gov/antibiotic-use/community/about/glossary.html>.

3. CMS. 2019. Table 6J.1 Additions to the CC List. FY 2020 Hospital Inpatient Prospective Payment System (IPPS) Final Rule. <https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AcuteInpatientPPS/index.html>.

4. CMS. 2019. Table 6I Complete MCC List. FY 2020 Hospital Inpatient Prospective Payment System (IPPS) Final Rule. <https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AcuteInpatientPPS/index.html>.

5. National Center for Health Statistics. FY 2020 ICD-10-CM Official Guidelines for Coding and Reporting; 94. https://www.cdc.gov/nchs/data/icd/10cmguidelines-FY2020_final.pdf.

6. Ibid: 23.

7. Ibid: 28-29.

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1. CDC, National Center for Emerging and Zoonotic Infectious Diseases (NCEZID), Division of Healthcare Quality Promotion (DHQP). 2010. VRE in Healthcare Settings. Reviewed November 24, 2010. Accessed August 13, 2019. <https://www.cdc.gov/hai/organisms/vre/vre.html>.

2. CMS. August 2, 2019. Fact Sheet on Fiscal Year (FY) 2020 Medicare Hospital Inpatient Prospective Payment System (IPPS) and Long Term Acute Care Hospital (LTCH) Prospective Payment System (CMS-1716-F).

<https://www.cms.gov/newsroom/fact-sheets/fiscal-year-fy-2020-medicare-hospital-inpatient-prospective-payment-system-ipps-and-long-term-acute-0>.

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5. World Health Organization. 2018. "Antimicrobial Resistance." Fact Sheets. February 15, 2018. Accessed August 13, 2019. <https://www.who.int/en/news-room/fact-sheets/detail/antimicrobial-resistance>.

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