

October 6, 2023

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

Dear Sir or Madam:

The American Health Information Management Association (AHIMA) respectfully submits the following comments on the ICD-10-CM code proposals presented at the September ICD-10 Coordination and Maintenance (C&M) Committee meeting that are being considered for April 1, 2024 implementation.

AHIMA is a global nonprofit association of health information (HI) professionals. AHIMA represents professionals who work with health data for more than one billion patient visits each year. AHIMA's mission of empowering people to impact health drives our members and credentialed HI professionals to ensure that health information is accurate, complete, and available to patients and providers. Our leaders work at the intersection of healthcare, technology, and business, and are found in data integrity and information privacy job functions worldwide.

### **Addenda**

#### ***Cachexia***

While AHIMA supports correcting the code numbers for Index entries for cachexia to reflect new code E88.A, Wasting disease (syndrome) due to underlying condition, we have concerns about the other proposed changes for the cachexia Index entries. Related Index entries also need to be corrected, and additional Index entries and Tabular instructional notes are needed to ensure accurate and consistent coding. Our concerns and recommendations are noted below.

- We do not support the proposed “see also” parentheticals after subterms under the main term “Cachexia.” These parentheticals are confusing and unnecessary. Looking up

the Index entry for the underlying disease will not capture the cachexia component. While NCHS may be attempting to show that both the underlying condition and the cachexia should be coded, we do not believe the “see also” notes accurately explain that. The use of brackets would be a better approach, and more consistent with the conventions of the classification, to show that the underlying condition should be sequenced before the cachexia. However, we recognize the use of brackets might be difficult to do when broad categories of diseases for underlying conditions are referenced rather than specific code numbers. We do not believe it is necessary to show the sequencing, or the fact that both the cachexia and the underlying condition should be coded, in the Index, as the instructional note under code E88.A clearly provides this direction.

We recommend that the “see also” parentheticals not be added. We also recommend that NCHS consider eliminating the subterms under the main term “Cachexia” that will point to new code E88.A and have a single subentry as shown below:

Cachexia R64

- due to

- - underlying condition – see Wasting disease (syndrome) E88.A

Listing various subterms under the main term “Cachexia” was appropriate when they referenced different codes, but is unnecessary now that the subterms describing various types of underlying conditions all reference code E88.A. The single subentry shown above provides the necessary information. When code E88.A is looked up in the Tabular, the “code first” note will make it clear that the underlying condition should be separately coded and should be sequenced first.

- There are conflicting Index entries for cachexia and wasting disease. The Index entries for “wasting disease, due to malnutrition,” “disease, wasting, due to malnutrition,” and “wasting disease, extreme (due to malnutrition)” direct users to code E43, Unspecified severe protein-calorie malnutrition. The Index entry for “cachexia, due to malnutrition” was corrected in the Fiscal Year (FY) Errata to reflect code E88.A, but the Index entries under “wasting disease” and “disease, wasting” have not been corrected.
- “Emaciation, due to malnutrition” is also indexed to code E43.
- Is wasting disease (syndrome) synonymous with wasting disease due to an underlying condition? “Disease, wasting NEC” and “wasting disease (syndrome)” are both indexed to code E88.A. However, this code specifically identifies wasting disease due to an underlying condition. “Cachexia due to underlying condition” is an inclusion term under code E88.A. Should “wasting disease NEC,” and “wasting disease (syndrome)” that is not specified as due to an underlying condition, be indexed to code R64, Cachexia? There is an Excludes1 note for “Cachexia NOS (R64)” under code E88.A. It is not clear if “cachexia NOS” and “wasting disease NOS” are synonymous.

- It is not clear if codes for malnutrition and wasting disease (cachexia) should be assigned together. Index entries and Tabular instructional notes do not provide clear direction and sometimes appear to conflict. As noted above, some Index entries for cachexia/wasting disease due to malnutrition point to malnutrition codes, whereas others point to code E88.A. Also, there is an Excludes1 note for nutritional marasmus (code E41) under code E88.A, but this note does not include other types of malnutrition. There are no instructional notes under the malnutrition codes or Index entries under the main term of Malnutrition that provide direction regarding the assignment of code E88.A along with the malnutrition codes.

We recommend that when cachexia is due to malnutrition, both conditions should be coded, just as other underlying conditions are coded in conjunction with cachexia. An instructional note to “use additional code, if applicable” for wasting disease due to underlying condition (code E88.A) should be added under the appropriate malnutrition codes. The Index entries for cachexia, wasting disease, and emaciation due to malnutrition should consistently direct users to code E88.A (except for nutritional marasmus, if the intent is that code E88.A should not be assigned with this type of malnutrition). The “code first” note under code E88.A provides sufficient direction regarding the need to code malnutrition and the associated wasting disease separately and the proper sequencing.

- The parenthetical for “see also Malnutrition, severe” in the corrected Index entry for Cachexia due to malnutrition in the FY 2024 Errata suggests that a code for severe malnutrition should be assigned when cachexia due to malnutrition is documented, even if there is no explicit clinical documentation of “severe” malnutrition. If that is the intent, we recommend that Index entries be added under Malnutrition to clarify that malnutrition due to cachexia should be coded as severe malnutrition. If that is not the intent, this Index entry should be revised.

We support the remaining Tabular and Index Addenda modifications proposed for implementation on April 1, 2024.

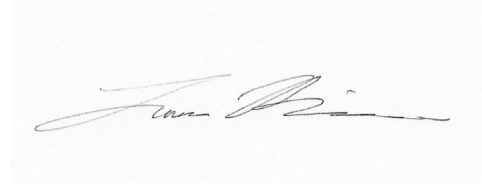
### ***Vascular Dementia***

We recommend that the proposed revision to the “code first” note under category F01, Vascular dementia, become effective April 1, 2024 instead of October 1, 2024.

We also recommend that in the future, all Addenda modifications presented at the September ICD-10 C&M Committee meeting be proposed for an April 1 effective date rather than an October 1 effective date.

Thank you for the opportunity to comment on the proposed ICD-10-CM modifications that would become effective on April 1, 2024. If you have any questions, please feel free to contact Sue Bowman, Senior Director of Coding Policy and Compliance, at (312) 233-1115 or [sue.bowman@ahima.org](mailto:sue.bowman@ahima.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren Riplinger", is centered on a white rectangular background.

Lauren Riplinger, JD  
Chief Public Policy and Impact Officer