



233 N. Michigan Ave., 21st Fl., Chicago, IL USA 60601-5809 | www.ahima.org | 312.233.1100

November 14, 2023

Mady Hue
Technical Advisor
Centers for Medicare and Medicaid Services
CM/TCPG/DICDRG
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Dear Ms. Hue:

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

Computer-aided Anesthesia and Oxygen Delivery System

AHIMA does **not** support the creation of an ICD-10-PCS code to identify the administration of inhaled anesthetics and oxygen using a computer-aided delivery system. This procedure is not reported separately for inpatient hospital coding, and the use of this technology does not represent a procedure that should be reported with an ICD-10-PCS code.

Also, we are concerned that the use of this technology will not be clearly documented in patients' medical records or the documentation may not be easy for coding professionals to find. As noted by the presenter at the C&M meeting, documentation of the use of this technology is not standardized and may consist of a variety of documentation approaches, such

as data output from the anesthesia machine directly recorded in the anesthesia record, text entry in the events section of the anesthesia record, or a manual tick box in the anesthesia record.

Introduction of Bone Void Filler

We support the creation of a new code in section X, New Technology, to identify introduction of AGN1 bone void filler.

Thank you for the opportunity to comment on the proposed ICD-10-PCS modifications that would become effective on October 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.

Sincerely,

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

Lauren Riplinger, JD
Chief Public Policy and Impact Officer