



American Health Information Management Association (AHIMA)
201 West Lake Street, 226
Chicago, Illinois 60606

November 12, 2025

Mady Hue
Technical Advisor
Centers for Medicare and Medicaid Services
CM/TCPG/DCDRG
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, 2026 implementation.

AHIMA is a global nonprofit association of health information professionals, with over 61,000 members and more than 88,500 credentials in the field. The AHIMA mission of empowering people to impact health® drives its members and credentialed HI professionals to ensure that health information is accurate, complete, and available to patients and clinicians. Leaders within AHIMA work at the intersection of healthcare, technology, and business, occupying data integrity and information privacy job functions worldwide.

Transcatheter Division of Interventricular Myocardial Septum

AHIMA supports the creation of a new ICD-10-PCS code for transcatheter division of the interventricular myocardial septum and we agree that this procedure seems to best meet the definition of the root operation Division. The SESAME system is described as an electrosurgical transcatheter myotomy system designed to lacerate the interventricular myocardial septum wall to treat left ventricular outflow tract (LVOT) obstruction, which seems to best meet the definition of the root operation Division.

Some of our members have told us that they believe the appropriate root operation for this procedure is Dilation rather than Division, based on information published in the Fourth Quarter 2017 issue of *Coding Clinic for ICD-10-CM/PCS*. They stated that currently, they would assign a code in table 027 Dilation of Heart and Great Vessels (specifically, code 027L3ZZ) for this procedure rather than a code in table 02Q Repair of Heart and Great Vessels as described under Current Coding in the topic packet. The 2017 issue of *Coding Clinic for ICD-10-CM/PCS* discussed the addition of a body part value for Ventricle, Left in ICD-10-PCS table 027, Heart and Great Vessels, Dilation, to describe corrective surgery for LVOT. As part of this discussion, it was stated:

“Correction of LVOT obstruction may involve removal of the subaortic membrane, myotomy of the left ventricle, or myomectomy of the left ventricle, or a combination of these procedures. Regardless of the specific technique, the objective is always to re-open and expand the LVOT to eliminate the obstruction.”

It is not clear if this advice should apply to the use of the SESAME system or even if it still applies to other myotomy techniques for corrective surgery to treat LVOT. The phrase “regardless of technique” suggests that any procedure performed to treat LVOT obstruction should be coded as Dilation. However, since the myocardial septum is not a tubular body part, and since lacerating the septum seems to fit the definition of Division, Dilation does not seem appropriate when the septum is divided via incision to treat the LVOT obstruction. **We recommend that CMS review the information published in the Fourth Quarter 2017 issue of *Coding Clinic for ICD-10-CM/PCS* and determine whether this guidance is still correct, or whether updated guidance should be published to ensure accurate and consistent coding of procedures performed to treat LVOT obstruction.**

Computer-aided Assessment of Glucose

We do **not** support the creation of a unique code for computer-aided monitoring of blood glucose. We believe the use of this technology is outside the scope of ICD-10-PCS and would not typically be reported in the hospital inpatient setting. It may also be difficult for coding professionals to readily find documentation of the use of this technology, as the nurses’ notes may be the only place where it is documented.

Thank you for the opportunity to comment on the ICD-10-PCS code proposals being considered for October 1, 2026 implementation. 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,



Lauren Riplinger, JD
Chief Public Policy and Impact Officer