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October 5, 2022

Mady Hue
Centers for Medicare and Medicaid Services
CMM, HAPG, Division of Acute Care
Mail Stop C4-08-06
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 and being considered for implementation on April 1, 2023.

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. The AHIMA 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.

Administration of Exagamglogene autotemcel (exa-cel)

While AHIMA supports creation of a new ICD-10-PCS code for exa-cel, we do not support implementation on April 1, 2023. Since the earliest a new technology add-on payment could go into effect is FY 2024, it is not clear why implementation of a new code on April 1 has been requested. **We recommend that a new code for exa-cel be implemented on October 1, 2023.**

Addenda and Key Updates

We support the proposed Index and Table Addenda changes, as well as the proposed updates to the Body Part, Device, and Substance Keys. We also support implementation of these changes on April 1, 2023.

Thank you for the opportunity to comment on the proposed ICD-10-PCS modifications being considered for implementation on April 1, 2023. 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
Vice President, Policy & Government Affairs