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

November 12, 2026

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 Fall 2026 ICD-10-PCS code proposals being considered for October 1, 2027 implementation.

AHIMA is a global nonprofit association of health information (HI) professionals, with over 67,000 credential holders in the field. 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 clinicians. Leaders within AHIMA work at the intersection of healthcare, technology, and business, occupying data integrity and information privacy job functions worldwide.

Visualization Guidance for Pressure Offloading during Patient Repositioning

AHIMA does **not** support creating a new ICD-10-PCS code for use of visualization guidance for pressure offloading during patient repositioning. Standard routine bed repositioning or turning of patients is a general nursing care activity and is not separately reported using ICD-10-PCS procedure codes.

Intracranial Introduction of Ultrasound Imaging Fluid

We do **not** support creating a unique ICD-10-PCS code for intracranial introduction of ultrasound imaging fluid. We do not believe the introduction of ultrasound imaging fluid should be separately reported using ICD-10-PCS procedure codes.

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Measurement of Volumetric Blood Flow in Peripheral Vessels

We do **not** support creating new ICD-10-PCS codes to describe measurement of volumetric blood flow in peripheral vessels. Existing ICD-10-PCS codes already describe measurement of peripheral vessel blood flow, as shown under Current Coding in the topic packet. The creation of new codes would result in overlap with the existing codes.

Intraoperative Control of Coronary Artery Hemorrhage using Rapid Exchange Catheter with Helical Perfusion Balloon

We support the creation of ICD-10-PCS codes in section X to identify intraoperative control of coronary artery hemorrhage using a rapid exchange catheter with a helical perfusion balloon.

Monitoring of Peritoneal Cavity using Electrode Sensors

AHIMA supports creating new ICD-10-PCS codes in section X to identify post-operative monitoring of the peritoneal cavity using a drainage system embedded with electrode sensors.

Computer-aided Assessment of Acute Abdominopelvic Pathology

We do **not** support creating ICD-10-PCS codes to describe computer-aided assessment of acute abdominopelvic pathology using AI analysis of CT imaging of the abdomen and pelvis. AI analysis of imaging studies should not be separately reported using ICD-10-PCS procedure codes.

We also do not support classifying this technology under the "Other Procedures" root operation, which is defined as "Methodologies which attempt to remediate or cure a disorder or disease." The proposal describes software that analyzes CT images in parallel with standard radiologist interpretation to identify time-sensitive pathology and facilitate worklist prioritization. These functions support image interpretation and clinical triage; they do not attempt to remediate or cure a disorder or disease and therefore do not meet the definition of this root operation.

Computer-aided Monitoring of Urine Output with Diuretic and Saline Administration

We do **not** support creating a new ICD-10-PCS code to describe computer-aided monitoring of urine output with diuretic and saline administration. Monitoring urine output is not the type of clinical activity that warrants separate reporting in ICD-10-PCS, and the use of computer-aided technology does not provide a basis for doing so.

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Bypass using Endovascular Transvenous Cerebrospinal Fluid (CSF) Shunt

We support the creation of a new ICD-10-PCS code to describe bypass using an endovascular transvenous CSF shunt.

We recommend revising the proposed Device value, "Intraluminal Device to Inferior Petrosal Sinus," to accurately reflect the destination of the diverted CSF. The eShunt implant redirects CSF from the intracranial subarachnoid space into the internal jugular vein. Although the implant traverses the inferior petrosal sinus and its body resides within that sinus, its outlet valve drains into the internal jugular vein. The proposed Device value therefore identifies the location of part of the implant rather than the destination of the bypass. We recommend a Device value identifying the internal jugular vein as the destination to accurately describe the CSF diversion pathway.

Administration of anzutresgene autoleucel

We do **not** support creating unique ICD-10-PCS codes to describe the administration of anzutresgene autoleucel (anzu-cel). This autologous T-cell receptor (TCR) T-cell therapy is adequately captured by the existing codes for introduction of non-chimeric antigen receptor T-cell immune effector cell therapy, as listed under "Current Coding" in the topic packet.

Thank you for the opportunity to comment on the ICD-10-PCS code proposals being considered for October 1, 2027 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

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