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October 13, 2021

VIA ELECTRONIC MAIL

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 April 1, 2022 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.

#### **Administration of Fostamatinib**

AHIMA supports the creation of new codes in section X, New Technology, to identify the oral or enteral administration of fostamatinib, effective April 1, 2022.

#### **Addenda and Key Updates**

We support the ICD-10-PCS Index and Table Addenda modifications and Substance Key updates requested for an April 1, 2022 implementation date. We also support implementation of these changes on April 1.

We are concerned that creating separate codes for administration of a third dose of the COVID-19 vaccine and administration of a COVID-19 booster may lead to inconsistent code assignment, as there is some confusion around the difference between a third dose and a booster.

Thank you for the opportunity to comment on the proposed ICD-10-PCS modifications being considered for implementation on April 1, 2022. 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 cursive script that reads "Wylecia Wiggs Harris".

Wylecia Wiggs Harris, PhD, CAE  
Chief Executive Officer