



October 5, 2022

Donna Pickett, MPH, RHIA  
ICD-10 Coordination and Maintenance Committee  
National Center for Health Statistics  
3311 Toledo Road  
Hyattsville, Maryland 20782

Dear Ms. Pickett:

The American Health Information Management Association (AHIMA) respectfully submits the following comments on proposed ICD-10-CM code modifications 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.

### **Social Determinants of Health**

AHIMA fully supports implementation of the proposed social determinants of health (SDOH) codes on April 1, 2023, with a few minor suggested modifications to the proposed codes.

We recommend that the Excludes2 note under proposed code Y07.499, Other family member, perpetrator of maltreatment and neglect, be deleted. This note seems unnecessary and is potentially confusing, as parental sibling is not the only family relationship that has a unique perpetrator code. Proposed perpetrator codes for child, grandchild, and grandparent would also be coded separately from other family members classified to code Y07.499.

The titles of codes Z59.10, Inadequate housing, unspecified, and Z59.11, Inadequate housing, are not sufficiently distinct. The title of one or both of these codes needs to be modified to clarify the appropriate use of these codes and to avoid potential overlap.

We recommend that the word “abuse” be added to the title of existing category Y07:

Y07 Perpetrator of **abuse**, assault, maltreatment and neglect

We also recommend that the title of subcategory Z59.7 be revised so that it includes the concepts classified to proposed new code Z59.71, Insufficient health insurance coverage. The title of subcategory Z59.7 is “Insufficient social insurance and welfare support.” Proposed new code Z59.71 includes types of insurance, such as private health insurance, that are not social insurance. Possible options for a revised title for subcategory Z59.7 include “**Insufficient insurance and welfare support**” or “**Insufficient health insurance and welfare support.**” The proposed inclusion terms of “Inadequate social and welfare insurance” and “Insufficient social and welfare insurance” would clarify that insufficient social insurance is included in this subcategory even though “social insurance” would no longer be part of the subcategory title. Also, to be consistent with the revised subcategory title, the title of proposed new code Z59.70 should be revised to align with the new subcategory title (e.g., “Insufficient insurance and welfare support, unspecified” or “Insufficient health insurance and welfare support, unspecified”).

For consistency with the existing codes in subcategory Z62.81, Personal history of abuse in childhood, we recommend that an Excludes1 note for “current child financial abuse” be added under proposed new code Z62.814 and an Excludes1 note for “current intimate partner abuse in childhood” be added under proposed new code Z62.815.

### **Addenda**

While not originally proposed for April 1 implementation, **we urge NCHS to implement the proposed Addenda changes on April 1, 2023 rather than October 1, 2023.** Just as CMS proposed an April 1 implementation date for the ICD-10-PCS Addenda updates presented at the September C&M meeting, the ICD-10-CM Addenda changes should also be implemented on April 1. Many of the proposed Addenda changes involve corrections, and we believe earlier implementation of corrections in the classification is one of the purposes and major benefits of an April 1 implementation date.

For the proposed revision to the instructional note under code T75.3, Motion sickness, there should be a dash after subcategory Y92.81. There is a dash after this code in the existing instructional note, and it is not clear if it may have been inadvertently deleted in the proposed revision shown in the topic packet.

The additional Excludes2 note being proposed under code Z79.4, Long term (current) use of insulin, is incorrect. The correct code for long-term (current) use of injectable non-insulin antidiabetic drugs is code Z79.85, not Z79.84, and there is already an existing Excludes2 note for code Z79.85. If the intent was to add an Excludes2 note for code Z79.84, then this note needs to be revised to reflect the correct title of code Z79.84 (Long term (current) use of oral hypoglycemic drugs).

We support the remaining proposed Addenda modifications.

Thank you for the opportunity to comment on the proposed ICD-10-CM 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](mailto:sue.bowman@ahima.org).

Sincerely,



Lauren Riplinger, JD  
Vice President, Policy & Government Affairs