



233 N. Michigan Ave., 21st Fl.  
Chicago, IL 60601

phone ▶ (312) 233-1100  
fax ▶ (312) 233-1090  
web ▶ www.ahima.org

November 9, 2017

VIA ELECTRONIC MAIL

Patricia Brooks, RHIA  
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. Brooks:

The American Health Information Management Association (AHIMA) respectfully submits the following comments on the ICD-10-PCS code proposals presented at the ICD-10 Coordination and Maintenance (C&M) Committee meeting held on September 12.

### **ICD-10-PCS Index/Body Part Key/Device Key Addenda**

AHIMA is concerned that the addition of an Index entry for “Biopsy see Extraction” under the main term “Fine needle aspiration” would cause confusion. It appears as though the subentries for “Fluid or gas see Drainage” and “Tissue see Excision” would be indented under this new subentry for Biopsy. Is that correct? If so, these Index entries would lead to confusion as to when the Extraction root operation should be used versus Drainage or Excision. Or is the intent that all fine needle aspiration biopsies (regardless of whether the biopsy involved tissue or fluid/gas) would be coded to Extraction? If that is the intent, the subentries for “Fluid or gas see Drainage” and “Tissue see Excision” should not be indented under “Biopsy see Extraction.”

AHIMA supports the remaining proposed ICD-10-PCS Index Addenda modifications.

### **ICD-10-PCS Table Addenda**

AHIMA **opposes** the proposed addition of device value Z (No Device) to the root operation Creation table 024. This change would conflict with the definition of Creation, which is “Putting in or on biological or synthetic material to form a new body part that to the extent possible replicates the anatomic structure or function of an absent body part.” By definition, the root operation Creation involves the use of a device.

We support the remaining proposed ICD-10-PCS Table Addenda modifications, including the proposal to add the root operation Control for the body part Nasal Mucosa and Soft Tissue in the Ear, Nose, Sinus body system. We recognize that some commenters at the C&M meeting suggested making this change in the Anatomical Regions, General body system instead of the

proposed body system, but we believe it would be appropriate to add the body part Nasal Mucosa and Soft Tissue to the Ear, Nose, Sinus body system.

Thank you for the opportunity to comment on the proposed ICD-10-PCS modifications. If you have any questions, please feel free to contact me at (312) 233-1115 or [sue.bowman@ahima.org](mailto:sue.bowman@ahima.org).

Sincerely,

A handwritten signature in black ink that reads "Sue Bowman". The signature is written in a cursive, flowing style.

Sue Bowman, MJ, RHIA, CCS, FAHIMA  
Senior Director, Coding Policy and Compliance