

American Health Information Management Association (AHIMA)
35 W. Wacker Dr., 16th Floor
Chicago, IL 60601

November 15, 2024

Mady Hue
Technical Advisor
Centers for Medicare and Medicaid Services
CM/TCPG/DICDRG
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 that are being considered for October 1, 2025 implementation.

AHIMA is a global nonprofit association of health information professionals, with over 61,000 members and more than 88,500 credentials in the field. The AHIMA mission of empowering people to impact health® drives its 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.

Administration of Roctavian™ (valoctocogene roxaparvovec-rvox)

While AHIMA supports the creation of a new code for the administration of valoctocogene roxaparvovec-rvox, we recommend that the new code be created in table 3E0 rather than section X.

Given the expected growth in gene therapies, we also recommend that a standard approach for classifying these procedures be adopted, such as creating a qualifier for gene therapy in table 3E0.

Insertion of Endovascular Anchors

We support the creation of a unique code in section X to identify temporary transvenous diaphragm activation.

Temporary Transvenous Diaphragm Activation

We support the creation of new codes in tables 02U and 04U to identify the placement of endovascular anchors in endovascular aortic aneurysm repair procedures.

Intraoperative Donor Organ Protection in Renal Transplantation

AHIMA does **not** support the creation of a unique code to describe the use of a protective insulation device on the donor kidney graft during renal transplant. We believe intraoperative donor organ protection is integral to the kidney transplantation procedure and should not be coded separately.

Thank you for the opportunity to comment on the proposed ICD-10-PCS modifications being considered for October 1, 2025 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,

A handwritten signature in blue ink, appearing to read "Lauren Riplinger", is positioned above the typed name.

Lauren Riplinger, JD
Chief Public Policy and Impact Officer