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October 11, 2024

Captain Monica Leonard
Team Lead, Classification and Informatics Standards
National Center for Health Statistics
Centers for Disease Control and Prevention
3311 Toledo Road
Hyattsville, Maryland 20782

Dear Captain Leonard:

The American Health Information Management Association (AHIMA) respectfully submits the following comments on the proposed ICD-10-CM Addenda changes presented at the September ICD-10 Coordination and Maintenance (C&M) Committee meeting and being considered for April 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.

ICD-10-CM Addenda

AHIMA does not support changing the Excludes1 note under code K56.41, Fecal impaction, and subcategory K59.0, Constipation, to an Excludes2 note. Based on the discussion at the November 2022 *Coding Clinic for ICD-10-CM/PCS* Editorial Advisory Board meeting, we believe the appropriate change is to delete the Excludes1 note under code K56.41 and leave the Excludes1 note under subcategory K59.0 unchanged. The intent is to clarify that when both fecal impaction and constipation are present, only the fecal impaction code should be assigned. As stated in the Second Quarter 2024 issue of *Coding Clinic for ICD-10-CM/PCS*, assign only code K56.41 for provider documentation of fecal impaction and constipation. Constipation is integral to fecal impaction and fecal impaction is a more severe condition. Changing both Excludes1 notes to Excludes2 notes would allow both codes to be coded together, which we do not believe is appropriate or consistent with the decision of the Editorial Advisory Board.

We recommend that the CDC implement all Addenda changes on the earliest possible date following the C&M meeting where they are presented. Addenda changes presented at the September C&M meeting should become effective on April 1 of the following year. Many of the proposed Addenda changes being proposed for April 1, 2025 and October 1, 2025 are very similar, and so it is not clear why they are being implemented on different dates. For example, the same proposed "use additional code" note for ascites is being added under different codes on both the April 1 and October 1 proposed Addenda.

Thank you for the opportunity to comment on the proposed ICD-10-CM Addenda modifications being considered for April 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,



Lauren Riplinger, JD
Chief Public Policy and Impact Officer