



October 14, 2022

Mady Hue, CMS
Co-Chair, ICD-10 Coordination and Maintenance Committee
Centers for Medicare & Medicaid Services
7500 Security Boulevard Baltimore, Maryland 21244-1850

Via email (ICDProcedureCodeRequest@cms.hhs.gov)

Ms. Hue:

On behalf of the American Thoracic Society (ATS) and American College of Chest Physicians (CHEST), we offer comments on coding proposals to be considered at the March, 2023 ICD-10 Coordination and Maintenance Committee meeting. Jointly, the ATS and CHEST represent over 20,000 pulmonary, critical care and sleep clinicians serving patients across the U.S., and around the globe. It is with our shared clinical expertise in pulmonary, critical care and sleep medicine that we provide the following comments:

Intubated Prone Positioning

The ATS and CHEST support the implementation of a qualifier K for intubated prone positioning in ICD-10-PCS, in section 5 table 5A0, Assistance of Physiological Systems. Intubated prone positioning is evidence-based, guideline recommended, and requires unique resources with associated costs that will be better captured with improved coding. Implementing a qualifier K will facilitate proper planning and allocation of hospital resources, quality assurance for patients afflicted with the adult respiratory distress syndrome, and research for both epidemiologic surveillance and comparative effectiveness.

Social Determinants of Health

The ATS and CHEST support these additional revisions and their implementation with the body of previously approved ICD-10-CM diagnosis codes broadening and specifying various social determinants of health.

Bronchiolitis obliterans syndrome (BOS)

The ATS and CHEST support development of specific codes for BOS, as a manifestation of chronic lung allograft dysfunction (CLAD) following lung transplantation and chronic graft versus host disease (GVHD) following allogeneic stem cell transplantation (alloSCT). While we support the creation of BOS and CLAD codes, we agree with many of the public commenters that other forms of bronchiolitis should be more specifically delineated. The ATS and CHEST worked closely with Dr. Seshadri in developing a revised code proposal that will be considered at the March 2023 meeting. We support the revised BOS code proposal and recommend its adoption by the committee.

Please let us know if you have questions or need additional information.

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Sincerely,



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