



2020 FY ICD-10-CM Talking Points:

Opportunity to submit comments to CDC on or before May 10, 2019 at 5 pm

- The Center for Disease Control's National Center for Health Statistics (NCHS), the Federal agency responsible for use of the International Statistical Classification of Diseases and Related Health Problems, has developed a clinical modification of the classification for morbidity purposes. The ICD-10-CM is a system used by physicians and other healthcare providers to classify and code all diagnoses, symptoms and procedures recorded in conjunction with hospital care in the United States.
 - During an open comment period, CDC welcomes input on newly proposed code modifications to help shape and create the final coding rule that will impact the upcoming ICD-10 policy year.
 - The comments that are submitted to CDC shape the future health care environment by giving health care providers improved codes to clearly identify and classify mortality data.
- On March 6, 2019 GLI's proposed ICD-10 coding change was presented at CMS.
 - We expressed concern with the current ICD-10-CM coding, specifically, that the current ICD-10-CM coding structure exists solely for hepatic fibrosis and cirrhosis, but does not distinguish patients with different stages of fibrosis.
 - We stressed that revisions to the coding are necessary to enable liver fibrosis to be classified more accurately and more consistently with current clinical perspectives and documentation, particularly in the context of nonalcoholic steatohepatitis (NASH).
- **With the prevalence of NASH expected to increase by 63% by 2030 in the United States it is critical to quickly align clinical documentation with the needs of this rapidly growing patient population.**
- **We need your help to communicate to CDC through this comment period that new ICD-10-CM codes will allow for clearer identification of patients who are at more advanced stages of disease and at greater risk for liver-related mortality and other clinical events.**



- **What You Can Do: *Submit a Comment no later than May 10, 5pm ET, Urging CDC to adopt the newly proposed Hepatic Fibrosis codes in the FY 2020 ICD-10-CM diagnosis and ICD10-PCS procedure codes.***
- It is critical that CDC hear from you to ensure they receive public comments from all sectors — patient advocates, caregivers, clinicians, providers, and other stakeholders.
- The following are some suggested key messages/components for your comments to CDC to help you get started. Please customize to make your comments your own:

I. REFERENCE THE ISSUE [*Insert organization/or individual name*] appreciate(s) the opportunity to comment on the Centers for Disease Control and Prevention Centers for Medicare and Medicaid Services' (CDC) FY 2020 ICD-10-CM diagnosis and ICD10-PCS procedure codes, and specifically to support the proposal to include new codes for Hepatic Fibrosis.

II. SHARE WHY ADDRESSING HEPATIC FIBROSIS ICD-10-CM CODING IS IMPORTANT TO YOU AND/OR YOUR ORGANIZATION'S MISSION (*Description of your organization or your role*) (name of organization/individual) is a (brief description of organization/affiliation if applicable). (Provide a brief description of your individual or your organization's interest/role in digital medicine.)

a. Nonalcoholic Steatophepitis (NASH) is a disease that causes fat to build up in the liver, which leads to inflammation and fibrosis. In the U.S., it is estimated that 16 million adults have NASH. Of these 16 million NASH patients, about 20% (3.3 million people) have advanced fibrosis. A person with advanced fibrosis due to NASH can develop end-stage liver disease (ESLD), which may necessitate liver transplantation and/or progress to liver cancer.

b. Currently, if a patient clearly has cirrhosis based upon liver biopsy or NITs, s/he can be identified using existing code K74.6. However, if the differentiation is not entirely clear, but NITs suggest early or advanced fibrosis, providers do not have the necessary codes in place to identify the level of disease severity.



- i. For example, if a patient regresses from fibrosis stage F3 to F2 the current codes do not clearly show this important change.
- c. We applaud the Agency's goal to improve the health of the American people through preventing disease and developing the best possible statistical information.
- d. With NASH expected to increase by 63% by 2030 in the United States, it could not be more critical to quickly align clinical documentation with the needs of this rapidly growing patient population.
- e. New ICD-10-CM codes will allow for clearer identification of patients who are at more advanced stages of disease and at greater risk for liver-related mortality and other clinical events.
- f. We thank CDC for your consideration of adopting the newly proposed Hepatic Fibrosis codes in the *FY 2020 ICD-10-CM diagnosis and ICD10-PCS procedure codes*.
- g. Sincerely, *[Include Signature of Organization Representative]*

INSTRUCTIONS FOR COMMENT SUBMISSION TO CDC

May 10, 2019 is the deadline for receipt of public comments on proposed new diagnoses codes and revisions discussed at the March 5-6, 2019 ICD-10 Coordination and Maintenance Committee meetings for implementation on October 1, 2020.

Please submit directly to Donna Pickett, Co-Chair, ICD-10-CM Coordination and Maintenance Committee, at nhsicd10CM@cdc.gov.

We thank you for your continued advocacy on this issue and ask that you submit comments to CDC **prior to their May 10th deadline**. Your support for adopting these quality measures as soon as feasible is invaluable and will be instrumental in improving the identification of patients who are at more advanced stages of a disease that can be life threatening.