

October 31, 2019

Ms. Donna Pickett
c/o National Center for Health Statistics
Metro IV, Room 2402
3311 Toledo Road
Hyattsville, MD 20782

Re: Proposal for adopting Sepsis-3 code set definitions

Dear Ms. Pickett,

The Association of Clinical Documentation Integrity Specialists (ACDIS) would like to comment on your proposal to change the ICD-10-CM code set to reflect the implementation of Sepsis-3 definitions of sepsis, severe sepsis, and septic shock.

ACDIS is a professional association representing more than 6,900 clinical documentation integrity (CDI) professionals nationwide. Their backgrounds include registered nurses (RN), health information management (HIM) professionals, case managers, quality improvement personnel, and physicians. CDI professionals work to ensure complete and accurate documentation in the medical record, which is integral to accurate assignment of ICD-10-CM diagnosis and ICD-10-PCS procedure codes.

Their work also helps to ensure the accurate reporting of quality measures, medical necessity of inpatient admissions and procedures, hospital and physician profiles, and other publicly available data.

We have been anticipating this change and are working to educate our members on the new Sepsis-3 definitions and the expected changes in the ICD-10-CM code set. On behalf of our members, we would like NCHS to work to ensure that the following changes will be made in conjunction with the update to the ICD-10-CM table:

1. An update of the ICD-10-CM Index, Table, and Guidelines to accurately reflect the change in the new definition of sepsis (sepsis with organ dysfunction).
2. Changing the relative weights and assignment of MS-DRGs 853-855 and 870-872 to reflect the changes in the new sepsis code set to ensure that hospitals and health systems are reimbursed appropriately for these high acuity patients.
3. Assigning MCC designation to the new sepsis code set to reflect the higher acuity of these patients and, again, to ensure that hospitals and health systems are appropriately reimbursed for these high acuity patients.
4. Updating of quality and patient outcome measurement algorithms that utilize sepsis codes as risk adjusters.

ACDIS appreciates the opportunity to work with you to provide an organized transition to the new Sepsis-3 code sets. Please let us know if we can provide any assistance during this transition. I may be reached at (781)639-1872, ext. 3216, or by electronic mail at bmurphy@acdis.org.

Respectfully,

Brian Murphy

Director

Association of Clinical Documentation Integrity Specialists