

October 31, 2019

Mr. Donald Thompson
Ms. Michele Hudson
Centers for Medicare and Medicaid Services
Department of Health and Human Services
P.O. Box 8013
Baltimore, MD 21244-1850

Electronic mail: MSDRGClassificationChange@cms.hhs.gov

Re: Proposal for adopting Sepsis-3 code set definitions

Dear Ms. Hudson and Mr. Thompson,

Thank you for allowing the Association of Clinical Documentation Integrity Specialists (ACDIS) the opportunity to submit comments regarding proposals applicable to the IPPS Final Rule for FY 2021. We are grateful for the resources that your organization invests in the health care community to improve the health and safety of the patient population, and appreciate the Centers for Medicare and Medicaid Services' willingness to review public comments that may impact your policy decisions.

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 and Medicare Severity diagnosis-related groups (MS-DRG).

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.

Today we are writing to express our appreciation regarding the review of the proposed changes to the MCC/CC designations for secondary diagnoses that were included in the IPPS Proposed Rules for 2020. We have found this process to be both fair and equitable. CMS's response to the public comments and their following up with the reassessment of the data is an excellent example of how a federal agency engages with the public.

ACDIS supports the new data regarding changes (both downgrades and upgrades) to the MCC/CC designation for secondary diagnoses and anticipates that they will all be included in the FY 2021 IPPS Proposed Rule. We look forward to working with CMS in the future on issues that impact the public's health and safety.

Respectfully,

Brian Murphy

Director

Association of Clinical Documentation Integrity Specialists (ACDIS)

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