

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](mailto: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 FY 2021 IPPS Final Rule. 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 respectfully submit our comments regarding the proposal submitted by Ms. Donna Pickett of the National Centers for Health Statistics to amend the ICD-10-CM table to reflect the Sepsis-3 definitions for sepsis, severe sepsis, and septic shock. We have been anticipating this change and are working to educate our members to the new Sepsis-3 definitions and the expected changes in the ICD-10-CM code set. On behalf of our members, we would like CMS 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 ensure 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](mailto:bmurphy@acdis.org).

Respectfully,

Brian Murphy

Director

Association of Clinical Documentation Integrity Specialists (ACDIS)