



April 24, 2023

David Berglund, MD, MPH Medical Officer / Classification and Public Health Data Standards National Center for Health Statistics, Mailstop P08 Metro IV, 2nd floor, Rm. 2534 3311 Toledo Rd. Hyattsville, MD 20782

Donna Pickett, MPH, RHIA Co-Chair ICD-10-CM/PCS Coordination and Maintenance Committee National Center for Health Statistics 3311 Toledo Road Room 2402 Hyattsville, MD 20782

Dear Dr. Berglund and Ms. Pickett:

On behalf of the membership of the American Thoracic Society and the American College of Chest Physicians (CHEST), we wish to express our gratitude for the inclusion of the new ICD-10-PCS codes capturing prone positioning of intubated patients in the FY2024 Proposed Rule documents:

5A09B5K	Assistance with Respiratory Ventilation, Less than 8
	Consecutive Hours, Intubated Prone
	Positioning
5A09C5K	Assistance with Respiratory Ventilation, 8-24 Consecutive
	Hours, Intubated Prone Positioning
5A09D5K	Assistance with Respiratory Ventilation, Greater than 24
	Consecutive Hours, Intubated Prone Positioning

As detailed in our initial proposal, prone positioning is an evidence-based therapy to improve outcomes for patients receiving ventilation support in the hospital, and the creation of this new ICD-10-PCS code will allow for improved benchmarking of prone positioning rates as well as allowing institutions to evaluate the resources used in providing prone positioning services.

As such, we wish to express our full support for these new codes, as well as our gratitude for your consideration of our proposal. We look forward to seeing the FY2024 Final Rule. Please do not hesitate to contact our content experts Dr. Scott

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Manaker (Scott.Manaker@uphs.upenn.edu) or Dr. Anica Law (<u>anicalaw@bu.edu</u>) if you have any further questions in the meantime.

Sincerely,

Omar Hussain DO ATS Co-Chair, Joint ATS/CHEST Clinical Practice Committee

Doreen Addrizzo-Harris, MD, FCCP CHEST President

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