



April 16, 2007

Edward Sondik, Ph.D.  
Director, National Center for Health Statistics  
Centers for Disease Control and Prevention  
3311 Toledo Road  
Hyattsville, MD 20782

Dear Dr. Sondik:

The health care field stands ready to move toward implementation of ICD-10-CM and ICD-10-PCS as replacements for the outdated ICD-9-CM. The American Health Information Management Association (AHIMA) and the American Hospital Association (AHA) have advocated for implementation in 2011. To achieve that goal, however, we need your help. While all members of the field are prepared to move to ICD-10, there is some disagreement over timing, based in part over concerns that ICD-10-CM is not ready.

The National Center for Health Statistics (NCHS) is responsible for maintaining and updating ICD-10-CM and creating crosswalk maps from ICD-9-CM to ICD-10-CM. While we are aware that NCHS staff has been updating ICD-10-CM on an ongoing basis, the version posted to your Web site is dated June 2003. Furthermore, no crosswalk between ICD-9-CM and ICD-10-CM is publicly available.

**We urge NCHS to post publicly a new version of ICD-10-CM and a crosswalk to ICD-9-CM as soon as possible. We are prepared to offer whatever assistance is necessary to help you.**

Publicly available, updated coding schemas are needed to:

- Allay concerns that the coding systems are not ready for adoption. The absence of an update to ICD-10-CM and a crosswalk have led some to ask for a delay in moving to ICD-10.
- Provide the tools necessary for the health care field to prepare for a transition to ICD-10. Vendors and other organizations have indicated that they need as much lead time as possible to create critical supporting software.
- Allow providers, payers, epidemiologists, public health agencies and others to evaluate the impact of moving to ICD-10.
- Ensure that ICD-10-CM is seen as a complete standard that can be adopted.

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The Centers for Medicare & Medicaid Services has been updating ICD-10-PCS annually, and posting both the coding system and a map between ICD-10-PCS and ICD-9-CM on its Web site. Without similar actions by NCHS, some members of the health care field are concerned about the ability of NCHS to adequately maintain and update ICD-10-CM. By making your updates public, you can successfully address those concerns and help to ensure timely implementation of ICD-10.

As you yourself have testified, expeditious implementation of ICD-10, will have many benefits, including:

- Ensuring that our coding system has sufficient specificity and detail, space for expansion, and structure to capture advances in medical practice and technology.
- Collecting accurate information needed to set payment rates and administer claims.
- Collecting accurate information to support important policy objectives, such as quality reporting, pay for performance, and public health reporting.
- Facilitating health information exchange as we move toward the adoption of electronic health records and a national health information network.

Both the AHIMA and the AHA appreciate the important work done by NCHS. Please call on us to assist you in making up-to-date coding and crosswalks available so that all of health care can benefit from a timely transition to ICD-10. At the AHIMA, contact Dan Rode, vice president for policy and government relations, at (202) 659-9440 ext. 11 or [dan.rode@ahima.org](mailto:dan.rode@ahima.org). At the AHA, contact Carmela Coyle, senior vice president for policy, at (202) 626-2678 or [ccoyle@aha.org](mailto:ccoyle@aha.org).

Sincerely,

Linda Kloss  
Executive Vice President and Chief Executive Officer  
American Health Information Management Association

Rick Pollack  
Executive Vice President  
American Hospital Association