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November 6, 2001

Donna Pickett, MPH, RHIA
Medical Classification Administrator
National Center for Health Statistics
Office of Planning and Extramural Programs
6525 Belcrest Road, Room 1100
Hyattsville, Maryland 20782

Dear Donna:

The American Health Information Management Association (AHIMA) opposes the use of V codes to identify those procedures that are considered new technology. While we recognize the limitations of the ICD-9-CM procedure codes and the need to consider innovative alternatives to identify new technology if there proves to be insufficient space in the ICD-9-CM procedural coding system, we do not believe that using V codes is a viable alternative.

V codes are located in the diagnosis classification and it would be confusing and problematic to introduce procedural concepts into a diagnostic classification. The V code section deals with occasions when circumstances other than a disease or injury classifiable to the main part of ICD are recorded as “diagnoses” or “problems.” Procedural concepts do not fall under this definition.

There is not an unlimited supply of available V codes. As more care is provided in post-acute settings, and as prospective payment systems continue to be developed for Medicare reimbursement in these settings, there is an increasing demand for more complete and accurate ICD-9-CM coding and more detailed and specific coded data in post-acute care. Therefore, as was demonstrated by the proposal for a number of new aftercare V codes at last week’s Coordination and Maintenance Committee meeting, the available V codes will be needed to better describe the reasons for care provided in non-acute settings.

Further, AHIMA believes that the use of V codes to describe procedural concepts would violate the regulation on electronic transactions and code sets promulgated under the Health Insurance Portability and Accountability Act (HIPAA). This regulation identifies the standard medical code sets to be used in electronic claims transactions. The ICD-9-CM diagnosis classification system is to be used for diseases, injuries, impairments, other health problems and their manifestations, and causes of injuries and their impairments. Procedural concepts are not included in the requirements for use of this standard code set.

Thank you for the opportunity to comment on the proposal to use V codes for procedures. If you have any questions, please feel free to contact me at (312) 233-1115 or sue.prophet@ahima.org.

Sincerely,

Sue Prophet, RHIA, CCS
Director, Coding Policy and Compliance

cc: Patricia Brooks, RHIA, CMS