May 10, 2019

Ms. Donna Pickett  
Co-Chair  
ICD-10 Coordination and Maintenance Committee  
National Center for Health Statistics  
3311 Toledo Road  
Hyattsville, MD  20782  
nchsicd10CM@cdc.gov

RE: Proposed new diagnoses codes and revisions discussed at the March 5-6, 2019 ICD-10 Coordination and Maintenance Committee meetings for implementation on October 1, 2020

Dear Ms. Pickett,

On behalf of the more than 63,000 members of the Obesity Action Coalition (OAC), a National non-profit organization dedicated to giving a voice to the individual affected by the disease of obesity, we appreciate the opportunity to comment on the Centers for Disease Control and Prevention and Centers for Medicare and Medicaid Services’ (CDC) FY 2020 ICD-10-CM diagnosis and ICD10-PCS procedure codes. In particular, OAC would like to express our support for the proposal to include new codes for Hepatic Fibrosis to account for the tremendous growth in Non-Alcoholic SteatoHepatitis (NASH).

While obesity and alcoholism are two very different health issues, both can have a similar impact on the liver. Nonalcoholic fatty liver disease (NAFLD) is the most common cause of chronic liver disease far surpassing alcohol-related liver disease. NAFLD is considered to be the hepatic manifestation of the metabolic syndrome, a cluster of closely related clinical features linked to visceral obesity and characterized by insulin resistance, dyslipidemia, and hypertension. As the prevalence of obesity and metabolic syndrome increases in the industrial world, NAFLD is expected to rise as well.

NASH is the most severe form of NAFLD and is characterized by the presence of an abnormal accumulation of fat in the liver which in some individuals can progress to liver cell injury (hepatocellular ballooning) and inflammation. Hepatocellular ballooning and inflammation – sometimes called necroinflammation – are commonly considered as the drivers of disease progression, or as the underlying causes of the disease. As NASH evolves, over time it can result in excessive scarring in the liver (fibrosis), a natural response to injury which can lead to liver cirrhosis or liver cancer.

While current ICD-10-CM codes exist for hepatic fibrosis and cirrhosis, there is no way to differentiate patients with different stages of fibrosis using the current coding structure. The OAC supports new ICD-10-CM coding to distinguish between early and advanced fibrosis, which will enable enhanced tracking and research into progression of disease and the impact of treatment.

Thank you,

Joseph Nadglowski, OAC President and CEO