October 24, 2020

Marilu Hue

Technical Advisor

Centers for Medicare and Medicaid Services

CM-HAPG-DAC

Mailstop C4-08-06

7500 Security Boulevard

Baltimore, Maryland 21244

Re: FY 2022 IPS Proposed Rule – Support for ACDIS Regulatory Committee Proposals

Request for Review of Severity Levels for Selected Z Codes

Dear Ms. Hue:

Thank you for allowing (insert Institution here) the opportunity to support several proposal submitted by the ACDIS Regulatory Committee for inclusion in the FY 2022 IPPS Proposed Rule.

We would like to specifically support the following proposals submitted by the Committee:

A request for reconsideration of the MCC exclusion list for Principal Diagnosis ICD-10-CM code I11.0

A request for consideration of DRG Reclassification, ICD-10-CM code B33.24

A request for a severity level (CC/MCC) review of the following Z codes representing specific social determinants of health:

Z55.0 Illiteracy and Low-Level Literacy

Z 56.0 Unemployment

Z59.0 Homelessness

Z59.4 Lack of Adequate Food and Safe Drinking Water

Z59.5 Extreme Poverty

Z60.2 Problems Related to Living Alone

Z65.1 Imprisonment and Other Incarceration

We greatly appreciate your consideration of these proposals and look forward to continuing to work with the IPPS process.

Respectfully,

(Name, Title, Institution)