

October 28, 2015

The Honorable Sylvia Mathews Burwell  
Secretary  
Department of Health & Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Burwell:

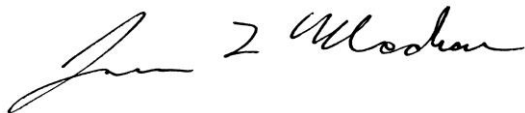
On behalf of the physician and medical student members of the American Medical Association (AMA), we would like to recommend that the American Academy of Professional Coders (AAPC) be added as an additional Cooperating Party for the ICD-10 Coordination and Maintenance Committee with equal authority of the existing four Cooperating Parties. AAPC's 141,000 members represent the highest level of expertise in the industry in the areas of medical coding, medical billing, medical auditing, compliance, and practice management. We believe that AAPC has the necessary expertise, experience and can serve as the voice of physicians that is lacking in today's Cooperating Parties.

Currently, the ICD-10 Coordination and Maintenance Committee are comprised of four organizations, known collectively as the Cooperating Parties. The Cooperating Parties include the Centers for Disease Control and Prevention's National Center for Health Statistics, the Centers for Medicare & Medicaid Services, the American Hospital Association (AHA), and the American Health Information Management Association (AHIMA). These Cooperating Parties are responsible for the development and maintenance of the ICD code set and its official guidelines, which are used for coding and reporting health care diagnoses and procedures. In particular, ICD-10 codes that are used to report diagnoses in both the outpatient and inpatient settings.

Although the ICD-10 Coordination and Maintenance Committee has performed admirably, we contend that the Cooperating Parties under represent the interests of physicians and other individual health care providers who work in practice settings and perform the majority of outpatient care in the U.S. Both AHIMA and AHA represent primarily hospitals and health care facilities, which leaves physicians without a clear voice in this process. This lack of representation is especially concerning given that the transition to ICD-10 will be most challenging for physicians and small practices. If added as a Cooperating Party, we believe AAPC could provide strong physician participation and represent the unique position of physicians practicing in outpatient settings.

We welcome the opportunity to discuss our request with you further. Please feel free to contact Nancy Spector, Director, Electronic Medical Systems, at [nancy.spector@ama-assn.org](mailto:nancy.spector@ama-assn.org) or (973) 263-9191 for more information.

Sincerely,



James L. Madara, MD