



AMERICAN ASSOCIATION FOR RESPIRATORY CARE

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February 28, 2018

Ms. Donna Pickett
Co-Chair, ICD-10-CM Coordination and Maintenance Committee
National Center for Health Statistics
3311 Toledo Road
Hyattsville, MD 20782
E-mail: dfp4@cdc.gov

Dear Ms. Pickett:

You may recall last year the American Association for Respiratory Care (AARC) wrote in support of a request from the American Thoracic Society to establish ICD-10-CM codes for e-cigarettes and other electronic nicotine delivery systems (ENDS). Approval of the request would enable healthcare providers to collect meaningful data on the health outcomes and effects of their use. We were disappointed to learn the committee did not give final approval at that time and understand a new application for 2018 is to be submitted to your committee shortly for consideration.

The AARC is a national professional organization with a membership of over 47,000 respiratory therapists who treat patients with chronic respiratory disease including asthma and Chronic Obstructive Pulmonary Disease (COPD) and whose organizational activities impact over 170,000 practicing respiratory therapists across the country. As an organization committed to protecting the public health of those who suffer from chronic respiratory disease, the AARC wholeheartedly endorses the ATS' request.

As noted in our previous comments, the Food and Drug Administration (FDA) and the Center for Disease Prevention and Control have published a significant amount of information on the increased use of e-cigarettes and other ENDS products by middle and high school students together with warnings about potential health risks and the need to gather research as to the long-term outcomes. Although the Food and Drug Administration is doing its part to regulate the use, review, manufacturing and distribution of all tobacco products, it is not enough if there

is no way to track costs and utilization of services associated with tobacco use through the identification of relevant diagnosis codes.

The AARC is particularly concerned that e-cigarettes and ENDS, which contain nicotine as well as other chemicals and carcinogens, have been linked to serious respiratory effects such as occupational asthma and bronchiolitis and respiratory irritants. We believe the creation of ICD-10-CM codes for e-cigarettes and ENDS is a viable and much needed resource to enable researchers and public health officials to study the potential health consequences of smokers who choose these products. We also support the addition in the 2018 application of new codes to record tobacco use during pregnancy and non-dependent tobacco use.

We encourage the ICD-10-CM Coordination and Maintenance Committee to accept the ATS' request to create new diagnosis codes for e-cigarettes and ENDS.

Sincerely,

A handwritten signature in black ink that reads "Brian K. Walsh". The signature is written in a cursive, flowing style.

Brian K. Walsh, PhD, RRT-NPS, RRT-ACCS, AE-C, RPFT, FAARC
President