



AMERICAN ASSOCIATION FOR RESPIRATORY CARE  
9425 North MacArthur Blvd., Suite 100, Irving, TX 75063, (972) 243-2272, Fax (972) 484-2720  
<http://www.aarc.org>, E-mail: [info@aarc.org](mailto:info@aarc.org)

June 17, 2022

Anica Law, MD, MS  
Assistant Professor, Boston University School of Medicine  
Staff Physician, Section of Pulmonary, Allergy, Sleep, and Critical Care Medicine, Boston Medical Center  
Faculty, Smith Center for Outcomes Research, Beth Israel Deaconess Medical Center  
72 Concord Street  
Boston, MA 02118

Dear Dr. Law:

As President of the American Association for Respiratory Care (AARC), I am pleased to endorse your request for an application to the Centers for Medicare & Medicaid Services (CMS) for a new ICD-10-PCS procedure code for intubated prone positioning. We believe the discussion and cogent rationale for the establishment of a new code outlined in your paper published in *AnnalsATS* provide sufficient information for CMS to act favorably on your request.

As a national organization representing the respiratory care profession, our members have seen firsthand the positive impact prone positioning has had on patients diagnosed with COVID-19. Given the enormous impact of the pandemic on staffing shortages, we agree that a new ICD 10 code specific to prone positioning of patients who are intubated would enable hospitals to more efficiently allocate resources in the ICU to ensure that professionals like respiratory therapists who are trained and educated in all aspects of pulmonary medicine provide evidence-based interventions.

Respiratory therapists play an integral role during the prone positioning procedure because of their expertise in airway and mechanical ventilation management. Patients that require prone positioning are at risk for artificial airway dislodgement as they are rotated 180 degrees. These critically ill and often hemodynamically unstable patients require that the artificial airway remains in its proper position and patent during and after the procedure. Additionally, respiratory therapists monitor and adjust the mechanical ventilator to optimize oxygenation and ventilation throughout the prone positioning event.

Thank you again for reaching out to the AARC and giving us an opportunity to endorse this important initiative.

Sincerely,

A handwritten signature in black ink that reads "Sheri Tooley". The signature is written in a cursive, flowing style.

Sheri Tooley BSRT, RRT, RRT-NPS, AE-C, CPFT, FAARC  
President and CEO 2021-2022