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September 22, 2023

ICD-10 Coordination and Maintenance Committee
Department of Health and Human Services
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Dear Committee Members,

Please accept the following comments regarding the application for hypoglycemia level diagnosis codes referenced on pages 79-80 of the September 12-13 ICD-10 Coordination and Maintenance Committee Meeting agenda.

The Association of Diabetes Care & Education Specialists writes to offer our support for the request for new ICD-10 codes to represent hypoglycemia level 1, level 2, and level 3. The definitions of those levels were created through a consensus process involving all the diabetes provider groups in the US (including ADCES) and several key patient organizations. The consensus to change from mild/moderate/severe to levels 1-3 also included perspectives on symptoms from people with diabetes. It would be very useful for clinicians to have these codes to easily and uniformly document occurrences of these events and will be beneficial for research purposes as well.

We supported the earlier application for these new codes in March/April 2023 and continue to support the application, as amended and presented at the September meeting of the committee.

Thank you for considering our comments. Please contact Hannah Martin (hmartin@adces.org) if you have any questions.

Best,

Hannah Martin, MPH, RDN
Director of Advocacy
Association of Diabetes Care & Education Specialists