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Cc:
Subject: Consultation Paper on the Pricing Framework for Australian Public Hospital Services [SEC=No Protective Marking]
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Hello

Thank you for the opportunity to provide comment on the *Consultation Paper on the Pricing Framework for Australian Public Hospital Services 2020–21 — June 2019*.

I am currently employed as a clinical coder / health information manager at Calvary Public Hospital Bruce and as a HIMAA clinical coding educator, however my previous experience has been in the classification development space with both DOH and AIHW. I would like to provide my rather specific and focussed thoughts on Section 4 of the consultation paper. These thoughts are stemming from my current coding role experiences, having previously been in more strategic role; and some of the frustrations I see now and going forward. Noting that these views are my professional views and do not reflect those of my current employers.

What should IHPA prioritise when developing AR-DRG Version 11.0 and ICD-10-AM/ACHI/ACS Twelfth Edition?

- Changes in the ICD-10-AM/ACHI/ACS twelfth Edition should be those that support a movement towards the introduction of ICD-11. For example exploration of how the concept of ‘clustering’ codes would be included – perhaps the use of modifiers in some specific conditions.
- that changes are driven by the uses of the data. Importance should be placed on maintaining consistency in data collection to support national data reporting uses such as trends over time in data analysis and national KPI reporting as well as the need to make changes to reflect current practice
- removal of the use of the U codes – chronic conditions for supplementary conditions. The use of these codes within the classification is confusing and is questionable in relation to having mutually exclusive categories. For e.g. the condition hypertension could be assigned U82.3 or I10. The selection of the code assigned rests on it meeting an ACS 0002 / 0003 which is outside the classification. The concept of capturing the information would be better suited via a supporting data element – not through a classification.
- A delineation needs to be made regarding material and immaterial classification changes. For example – one of the changes in the recent release was the removal of brackets and tidying up of inconsistencies across the classification. While this is a ‘major’ change in terms of the work involved the result is an immaterial change to the coder collecting the data – so while it should be acknowledged to have occurred it need not wait for a new edition. Other changes such as adding a NEM to a alphabetic look up also bears little real effect to data collection so need not wait for a two year cycle to be implemented. It is a clarification of current practice more so than a change.
- Consideration of streamlining processes with classification development is important and also streamlining access to coding queries which currently are sourced from disparate sources.
Once again – thank you for the opportunity to provide input.

Regards
Jodee Njeru