



1st December, 2023

Prof. Michael Pervan
Chief Executive Officer
Independent Hospital & Aged Care Pricing Authority
PO Box 483
Darlinghurst NSW 1300

Dear Prof. Pervan,

Re: Consultation Paper - Development of ICD-10-AM/ACHI/ACS Thirteenth Edition and AR-DRG Version 12.0

Thank you for the opportunity to comment on the above consultation.

AHSA supports the expansion of DRG grouping in the obstetrics chapter, as it will provide greater granularity and classification of differing complexity during pregnancy and childbirth.

I note that section 6 "The future of ICD-10-AM" outlines the ICD-11 mapping project, and IHACPA's plan to engage with jurisdictions. AHSA requests that this consultation and engagement be extended to the private sector, namely hospitals and insurers. It is imperative that the private sector is abreast of the impact of ICD-11 on our vendors with as much lead time as possible, so that we can commence our own planning for systems, hospital contracting and other functions.

One of our member funds has provided feedback on the specific consultation questions, therefore we have provided this as an Appendix.

Please do not hesitate to contact [REDACTED] email [REDACTED] if you wish to discuss further.

Yours sincerely

A handwritten signature in black ink, appearing to read "Andrew Sando", is written over a white background.

Andrew Sando
Chief Executive Officer

Appendix 1 – Specific feedback from GMHBA Health Insurance

Q1 Public Health Considerations – Consider mental health disorder due to climate change.

Q2 Social factors – Consider the inclusion of refugee status and social media addiction.

Q5 Cluster coding – Consider adding diabetes and potentially stroke/brain injury deficits, noting that they could be a stage 2 priority.

Q6 Complications of Surgical/Medical care – Movement of the pregnancy post procedural complications back into the obstetric chapter.

Q7 Difficult Intubation – GMHBA agree with concept, however, would like further clarification within ACS 1924 around classification combinations and pathways.

Q8 ACS Standardisation – GMHBA are interested to see how these transfer into instructional notes and impacts on DRG assignment.

Q18. DRG 801 Review – GMHBA agree with this proposal.