October 11, 2023

National Center for Health Statistics
ICD-10-CM Coordination and Maintenance Committee
Centers for Diseases Control and Prevention
3311 Toledo Road
Hyattsville, MD 20782-2002

Submitted via: nchsicd10CM@cdc.gov.

Re: Comments for ICD-10-CM Code Application for Hypoglycemic Level

Dear ICD-10 Coordination and Maintenance Committee,

Thank you for the opportunity to provide comments on the application for ICD-10-CM diagnosis codes, that if approved, will be used to report hypoglycemic levels on healthcare encounter claim forms.

Founded in 1916, the Endocrine Society represents approximately 18,000 physicians and scientists engaged in the treatment and research of endocrine disorders, such as diabetes, hypertension, infertility, obesity, osteoporosis, endocrine cancers (i.e., thyroid, adrenal, ovarian, pituitary) and thyroid disease.

The Endocrine Society supports the creation of diagnosis codes to report hypoglycemic levels. As you may know, the Society submitted a similar letter in support of these codes in April 2023 and we are pleased to support this updated application. The new diagnosis codes, as outlined in the application before the committee, will provide a more refined means to report glucose concentration, which will provide a more complete picture of the patient’s current condition. The proposed codes are modeled after the blood glucose levels that were created in 2017. The Endocrine Society was one of several medical specialty societies and non-profit organizations that supported the creation of that level system.

Prior to 2017, hypoglycemia was characterized as mild, moderate or severe. This provided little detail as to the actual glucose concentration of the patient, and often led to misdiagnosis or incorrect patient management. In 2017, levels 1, 2 and 3 were created to indicate more precisely the glucose concentration within the patient’s blood.\(^1\) Those levels corresponded to the following:

- Level 1: glucose concentration < 70 mg/dL
- Level 2: glucose concentration < 55 mg/dL

---

\(^1\) The Endocrine Society. [Stay Safe from Hypoglycemia Infographic](https://www.endocrine.org/).
Level 3: glucose concentration < 40 mg/dL

The new codes will follow this format, creating levels that correspond to mg/dL, and will be an improvement to the existing ICD-10-CM code set. If approved, the codes will allow for better tracking of patients with hypoglycemia, including tracking their outcomes which will assist with research and will allow for physicians and other providers within the healthcare system to make appropriate treatment decisions.

Thank you again for the opportunity to provide comments. If you have questions or would like to discuss this issue, please contact Rob Goldsmith, Director of Advocacy and Policy, at rgoldsmith@endocrine.org.

Sincerely,

[Signature]
Robert Lash, MD
Chief Medical Officer