Dear Ms. Hue and Ms. Pickett,

On behalf of the Alzheimer’s Association, we write to you in your capacities as members of the ICD-10 Coordination and Maintenance Committee to express our concerns about a recent proposal being considered for ICD-11.

It is our understanding that under ICD-11, dementia-related diagnostic codes would be moved from the Mental and Behavioral Disorders section to the Diseases of the Nervous System section, effectively precluding mental health professionals, including psychiatrists, from receiving reimbursement for treating persons with dementia.

Studies have found that more than 90 percent of people with dementia develop at least one dementia-related behavior like hallucinations and aggression, and a significant percentage of these individuals have serious clinical implications. Depression and anxiety are also common among people with dementia. These behavioral and psychological symptoms of dementia (BPSD) cause considerable stress for caregivers. In fact, in its recently-approved G0505 billing code in the 2017 Physician Fee Schedule, the Centers for Medicare & Medicaid Services explicitly requires neuropsychiatric and behavioral assessments of individuals with cognitive impairment in order to receive care planning. Inclusion of this element acknowledges the prevalence of BPSD among beneficiaries with dementia and that these behaviors must be managed. If mental health professionals cannot receive reimbursement under the ICD-11 proposal, individuals with dementia will lose access to a critical aspect of their care.

Furthermore, many clinicians, including neurologists, are not trained to manage BPSD. As a result, clinicians without training may turn to unnecessary and risky pharmacologic medications like antipsychotics, which runs contrary to CMS’s successful, ongoing efforts to reduce inappropriate use of antipsychotics in this population. Clinicians such as psychiatrists who are trained in BPSD management are aware of effective, safer non-pharmacologic interventions. We respectfully request that the Committee explore this proposal and its impact on clinicians and beneficiaries with Alzheimer’s and dementia.

Thank you for your consideration. The Alzheimer’s Association would be pleased to discuss the issue in greater depth and assist the ICD-10 Coordination and Maintenance Committee as needed. Please do not
hesitate to contact Laura Thornhill, Manager of Regulatory Affairs, at 202/638-7042 or lthornhill@alz.org if we can be of service.

Sincerely,

[Signature]

Robert Egge
Chief Public Policy Officer

Maria C. Carillo, PhD
Chief Science Officer