

Dear Independent Health and Aged Care Pricing Authority (IHACPA),

The Australian Association of Psychologists Incorporated (AAPI) are the leading not-for-profit peak body representing all psychologists Australia-wide. We have over 10,000 members, and are committed to supporting the health and wellbeing of psychologists in Australia, and Australians who need access to psychological support.

Please see our comments provided below regarding the Development of International Classification of Diseases (ICD-10-AM/ACHI/ACS) Thirteenth Edition and AR-DRG Version 12.0 released for public consultation.

1. Do you agree with the proposed changes to capture new, missing or important public health considerations in ICD-10-AM Thirteenth Edition? Yes
2. Are there additional considerations for the capture of social factors that should be considered for ICD-10-AM Thirteenth Edition (or a future edition)? Inclusion of refugee history and current status
3. Are there other new interventions that should be uniquely classifiable in ACHI for Thirteenth Edition (or a future edition)? No
4. Are there any additional considerations for organ, tissue and cell and procurement and transplantation that should be prioritised for ICD-10-AM and ACHI Thirteenth Edition? No
5. Are there any additional considerations for the implementation of cluster coding that should be prioritised for ICD-10-AM Thirteenth Edition? No
6. Are there any additional considerations for the implementation of ACS 1904 Complications of surgical and medical care that should be prioritised for Thirteenth Edition? No
7. Are there any additional considerations for difficult intubation that should be prioritised for Thirteenth Edition? No
8. Are there any additional considerations in relation to the standardisation of the ACS that should be prioritised for Thirteenth Edition? No
9. Do you have any additional feedback on the proposed changes for ICD-10-AM/ACHI/ACS Thirteenth Edition? No
10. Do you support the proposed guiding principles for intervention type? Yes
11. Do you support the proposed amendments for ACHI code intervention types, listed in Appendix A, to align with the proposed guiding principles for intervention type? Yes
12. Do you support the creation of ADRG U69 Mental and Behavioural Disorders Associated with the Puerperium in MDC 19 Mental, Behavioural and Neurodevelopmental Disorders, using the ICD-10-AM codes listed in Appendix B? Yes

13. Do you support the disaggregation of ADRG O66 Antenatal and Other Admissions related to Pregnancy, Childbirth and the Puerperium and creation of four medical ADRGs in MDC 14 Pregnancy, Childbirth and the Puerperium? Yes
14. Do you support the proposed grouping of ICD-10-AM codes to form the four new medical ADRGs in MDC 14 Pregnancy, Childbirth and the Puerperium, listed in Appendix C? Yes
15. Do you support the grouping of mastitis and other infections of the breast to ADRGs O04 Postpartum and Post Abortion with General Interventions or O61 Postpartum and Post Abortion without General Interventions, regardless of attachment difficulty? Yes
16. Do you support increased DCL precision for the 25 diabetes mellitus codes listed in Appendix D? Yes
17. Do you support the proposal to create ADRG A41 Posthumous Organ Procurement? Yes
18. Do you support the proposed ADRGs for episodes that currently group to ADRG 801 General Interventions (GIs) Unrelated to Principal Diagnosis as outlined in Appendix E? Yes
19. Do you have any additional feedback on the proposed changes for AR-DRG V12.0? No

Thank you for considering our feedback, we look forward to working closely with you for future editions.

Warmly,

The Australian Association of Psychologists Incorporated

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