

October 24, 2024

ICD-10-CM Coordination and Maintenance Committee Attention: Shannon McConnell-Lamptey National Center for Health Statistics 3311 Toledo Road Hyattsville, MD 20782

RE: Primary Progressive Apraxia of Speech (PPAOS)

Dear Committee Members:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to express support for a new code to describe **primary progressive apraxia of speech (PPAOS)**, which was presented at the September 11, 2024 meeting of the ICD-10-CM Coordination and Maintenance Committee, as well as to offer recommendations regarding placement of PPAOS in the ICD-10-CM code set.

ASHA is the national professional, scientific, and credentialing association for 234,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students.

ASHA supports the request by the Neurodegenerative Research Group at Mayo Clinic to add a new code for the diagnosis of PPAOS to the ICD-10-CM code set. Apraxia of speech (AOS) remains the most salient feature of PPAOS, and its presentation and pathophysiology distinguish PPAOS as a clinically separate and distinct diagnosis from other neurodegenerative diseases. However, patients with PPAOS are currently captured under primary progressive aphasia (PPA) or AOS due to a lack of more specific coding options. This leads to delayed identification and intervention, which harms patient outcomes.

Studies have shown that early intervention by SLPs has slowed the progression of deterioration of speech and communication skills in patients with PPAOS. Learning new communication strategies and using alternative assistive means of communication requires cognitive skills that are noted to rapidly decline in patients with PPAOS. Given the progressive nature of this syndrome and pervasive cognitive deficits, early identification is critical to establish a care path to address communication needs in the early phases of the disease. Designating a specific ICD-10-CM code will strengthen these efforts.

ASHA strongly agrees with the recommendation that the new ICD-10-CM code for PPAOS should be placed within Chapter 6. We also agree that the existing ICD-10-CM codes for apraxia (apraxia following cerebral vascular disease -I69.090, 169.190, I69.290, I69.390, I69.990; and apraxia—R48.2) do not accurately capture PPAOS. R48.2, the most commonly used code for AOS, is also used to capture childhood apraxia, diminishing the ability to reflect the distinct nature of PPAOS. Given the nature of the disease and how it imitates the path of PPA for progression and similarity to other diseases classified under this series, ASHA agrees that the proposed code G31.87 is accurately placed under Chapter 6 for diseases of the nervous system. Having a more granular code as proposed will allow clinicians to report disease to the highest degree of specificity—a foundational principle of ICD-10-CM coding.

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The ability to accurately report these conditions is critical to provide a complete picture of the patient and ensure they receive medically necessary interdisciplinary interventions. There is a pressing need for a new ICD-10-CM code to identify PPAOS accurately and distinctly in order to better understand the disease process, track incidence and prevalence, and improve treatment outcomes.

Thank you for the opportunity to provide comments in support of the recommendations to add PPAOS to the ICD-10-CM code set. If you or your staff have any questions, please contact Inoka Tennakoon, MS, CCC-SLP, ASHA's director of health care policy for coding and payment, at itennakoon@asha.org.

Sincerely,

Tena L. McNamara, CCC-A/SLP

2024 ASHA President

¹ Duffy, J. R., Utianski, R. L., & Josephs, K. A. (2020, July 7). Primary progressive apraxia of speech: from recognition to diagnosis and care. *Aphasiology*. 35(4):560-91. https://pubmed.ncbi.nlm.nih.gov/34219857/
² Utianski, R. L., Duffy, J. R., Clark, H. M., Strand, E.A., Boland, S. M., Machulda, M. M., Whitwell, J.L., & Josephs, K. A. (2018, November 21). Clinical Progression in Four Cases of Primary Progressive Apraxia of Speech. *American Journal of Speech-Language Pathology*. 27(4):1303-18. https://pmc.ncbi.nlm.nih.gov/articles/PMC6436456/