

July 31, 2017

Donna Pickett, RHIA
Co-Chair ICD-10-CM Coordination and Maintenance Committee
Centers for Disease Control and Prevention National Center for Health Statistics
Office of Planning and Extramural Programs
3311 Toledo Road
Hyattsville, MD 20782

Dear Ms. Pickett:

I am writing to you today on behalf of the Catholic Health Association of the United States (CHA), the national leadership organization of more than 2,000 Catholic health care systems, hospitals, long-term care facilities, sponsors, and related organizations. For over 10 years, CHA has worked with our members to encourage community partnerships to address human trafficking and to provide them with tools for identifying and treating victims. We are also a part of the National Coalition of Catholic Organizations Against Human Trafficking.

I am writing in support of a petition that was previously filed by the Massachusetts General Hospital Human Trafficking Initiative and Freedom Clinic, Catholic Health Initiatives, and the American Hospital Association for additional ICD-10-CM codes for forced sexual exploitation and forced labor exploitation. The petition was submitted to the Centers for Disease Control and Prevention on July 14 and hopefully will be presented at the ICD-10-CM Coordination and Maintenance Committee meeting in September.

This is an issue of significant importance to our members who screen for and treat victims of human trafficking. The needs of victims are complex. Typically, victims need not only physical care, but also social and emotional support as well as assistance in finding safe housing and other community services.

Currently, there is no ICD-10-CM code available for providers to accurately account for human trafficking victims encountered in clinical settings. Clinicians must rely on the use of other abuse codes which are inadequate to properly classify the complex trauma associated with human trafficking. Accurate coding will allow for appropriate care planning and will have the double benefit of also being able to account for this tragic reality, providing a reliable mechanism for tracking and reporting.

We urge the CDC to advance the request for ICD-10-CM code(s) related to human trafficking for presentation at the September meeting.

Sincerely,

Michael Rodgers

Michael Koda

Senior Vice President, Advocacy & Public Policy