



Oncology Nursing Society

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Ms. Donna Pickett, MPH, RHIA
Co-Chair, ICD-10 Coordination and Maintenance Committee
National Center for Health Statistics
Centers for Disease Control and Prevention
3311 Toledo Road, Room 2402
Hyattsville, MD 20782
nchsicd10CM@cdc.gov

Dear Ms. Pickett,

The Oncology Nursing Society (ONS) appreciates the opportunity to provide insight regarding the general support for recognizing “Breakthrough Pain” (BTP) as a distinct diagnosis on clinical grounds.

We genuinely appreciate the Committee taking the time to consider supporting the effort to add an ICD-10 code for BTP. Although “Breakthrough Cancer Pain” (BTCP) has been recognized as a serious medical condition for more than 25 years, it is surprising that there is still no ICD-10-CM code specifically designated for the condition. BTCP is widely recognized in peer-reviewed literature and by the FDA. The creation of this code is important because baseline persistent pain and breakthrough cancer pain are distinct components of chronic pain and are managed differently. It is ONS’s position that all people with cancer have a right to optimal pain relief.

Currently, G89.3 is the only code available for describing “Neoplasm related pain (acute) (chronic)”, but it is not specific for “Breakthrough Pain.” It is anticipated that the creation of a BTCP ICD-10-CM code will reduce barriers to health economic outcomes and epidemiologic research that are currently constrained by the absence of a code. In addition, the lack of diagnosis specificity can adversely impact access by cancer patients to medicine for breakthrough pain episodes and the creation of an ICD-10-CM code will help protect patient access.

ONS appreciates the opportunity to comment and thanks the Committee for its consideration of this new code. If you have any questions about our comments, please contact Alec Stone, MA, MPA, ONS Director of Health Policy, at astone@ons.org. We look forward to engaging in an ongoing dialogue to address issues of importance to ONS and patients with cancer.

Sincerely,

Susan Schneider, PhD, RN, AOCN®, FAAN
President

ONS is a professional organization of over 39,000 registered nurses and other health care providers dedicated to excellence in patient care, education, research, and administration in oncology nursing. ONS members are a diverse group of professionals who represent a variety of roles, practice settings, and subspecialties. Our nurses are leaders in the health care arena, committed to continuous learning and leading the transformation of cancer treatment by advocating for high-quality care for people with cancer.