



CLAAD

**Center for Lawful Access
and Abuse Deterrence**

December 20, 2010

Donna Pickett RHIA, MPH
Medical Classification Administrator
National Center for Health Statistics, CDC
3311 Toledo Road
Hyattsville, MD 20782
dfp4@cdc.gov

Via email

Re: ICD Revisions

Dear Ms. Pickett:

The Center for Lawful Access and Abuse Deterrence (CLAAD) is a coalition of organizations working to prevent prescription drug diversion, misuse and abuse. CLAAD respectfully requests that the CDC revise the U.S. adaptation of the International Classification of Diseases (ICD) to help us prevent drug overdose deaths. It is our understanding that this proposed revision was presented and discussed at the September 16, 2010, ICD Coordination and Maintenance Committee public meeting.

Prescription drugs are now a leading cause for poisonings in the U.S. Emergency room visits related to prescription and over-the-counter drugs have doubled in four years and now match the overdose rates for heroin and cocaine.¹

Unfortunately, the data we have on prescription-related deaths is limited; therefore, our understanding of the cause of the problem and our ability to implement the most effective solutions are inadequate.

For U.S. deaths there must be a death certificate indicating the cause of death. Data on the death certificates are then recorded at the CDC using ICD codes. The structure of the ICD code system mixes legal and illegal drugs together. Furthermore, current ICD codes group together drugs and drug classes, and do not specify individual medications. This system limits understanding of the frequency with which any specific medication is associated with deaths.

Effective programs to prevent deaths require that we know which drugs are most responsible for deaths. Revising the U.S. adaptation of ICD codes will provide more useful information for researchers, which should lead to more effective interventions and

¹ Tom Randall, "Prescription Drugs Match Heroin, Cocaine in Overdoses in U.S.," *Bloomberg*, 17 June 2010.

Page 2
12/20/10
ICD Revisions

fewer deaths. Along with this letter, please find attached more detail on the proposed revisions to the ICD as developed by Lynn R. Webster, M.D., and the American Academy of Pain Medicine.

Thank you for considering this proposal. Please do not hesitate to contact our organization with any questions you may have.

Best regards,

A handwritten signature in black ink that reads "Andrea G. Barthwell, MD". The signature is written in a cursive, flowing style.

Andrea G. Barthwell, M.D., F.A.S.A.M.
On behalf of the CLAAD Board of Directors

Copy: Congresswoman Mary Bono Mack
Director Thomas Frieden, CDC
Marjorie Greenberg, National Center for Health Statistics, CDC
Congressman Hal Rogers
Secretary Kathleen Sibelius, Dept. of Health and Human Services

Attachment: Proposed Revisions to ICD