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Association of America

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November 8, 2019

Donna Pickett, MPH, RHIA  
ICD-10 Coordination and Maintenance Committee National Center for Health Statistics  
3311 Toledo Road  
Hyattsville, Maryland 20782  
[nchsicd10CM@cdc.gov](mailto:nchsicd10CM@cdc.gov)

Dear Ms. Pickett,

We write as members of the injury prevention community and the Trauma Center Association of America in support of the ICD-10-CM proposal to add codes for electric scooters and other micro-mobility devices, initially submitted by the American College of Surgeons Committee on Trauma, the UNC Highway Safety Research Center, Atrium Health, and the Vision Zero SF Injury Prevention Research Collaborative between Zuckerberg San Francisco General Hospital and Trauma Center and the San Francisco Department of Public Health.

E-scooters are rapidly emerging as a popular method of transportation in more than 100 US cities and 20 other countries around the world. E-scooters include a narrow deck on which riders stand and control a battery-powered electric motor, using a thumb throttle to move at up to 20 miles per hour. While e-scooters have been available since the early 2000s, the number of devices on the roads has drastically increased since the advent of e-scooter rental services in 2017. According to the National Association of City Transportation Officials, over 38.5 million e-scooter trips were made in 2018.

While epidemiological data on e-scooters is limited, injuries resulting from e-scooters differ from those involving conventional bicycles or motorcycles based on the combination of an elevated center of gravity and the presence of a motor, which produces high speeds. These injuries are often severe, with many requiring subsequent hospitalization of the rider or other pedestrians involved in the collision. However, research into e-scooter injuries is greatly limited due to the difficulty of identifying these incidents in medical records and other health data sources without specific ICD-10-CM codes. A survey of 17 trauma centers around the country revealed that more than 30 different ICD-10-CM codes are being used to identify e-scooter injuries due to a lack of a standardized system. Studies to date have relied on identification of cases using keyword searches, so current estimates likely undercount these injuries. Without a unified approach to identify and characterize e-scooter injuries, we may not be able to effectively address this increasingly common mechanism of injury.

The addition of ICD-10-CM External Cause of Morbidity codes to classify e-scooters will allow for easier and more specific characterization of these injuries. With this level of detail, the injury prevention community will be better able to track these injuries in order to educate the public on e-scooter safety, develop injury prevention strategies, and develop interventions more specifically tailored to and appropriate for these types of injuries.

For all the above reasons, having ICD-10-CM codes to identify e-scooter and other standing micro-mobility associated injuries is of critical importance. We urge you to adopt these mechanism of injury codes for implementation October 1, 2020.

Thank you for the opportunity to comment on the proposed ICD-10-CM code revisions. If you have any questions, please feel free to contact me at [Jennifer@traumacenters.org](mailto:Jennifer@traumacenters.org) or 704.360.4665.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Ward". The signature is written in a cursive, flowing style.

Jennifer Ward, MBA, BSN, RN  
President  
Trauma Center Association of America