

Outpatient Facility Coding Alert

ICD-10 Delay: Use Extra Time For Thorough Prep for ICD-10, Experts Advise

Tip: Keep focusing on clinical documentation.

If you weren't quite sure whether your facility would be ready for ICD-10 implementation, you can breathe a little easier. Thanks to actions by Congress and President Obama in late March and early April, you'll have at least one more year to prepare for the new diagnosis system. **Background:** Congress introduced the bill (the Protecting Access to Medicare Act of 2014) in a move designed to avoid the 24 percent pay cut physicians were due to face on April 1, 2014. But a small portion of the bill's text that only took up seven lines will have just as large an effect on physicians and facilities in the next year.

Wording: The bill's verbiage read, "The Secretary of Health and Human Services may not, prior to October 1, 2015, adopt ICD-10 code sets as the standard for code sets." That means ICD-10 implementation will be delayed until at least Oct. 1, 2015.

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While many feel this new law and resulting ICD-10 implementation delay is not good for practices, there may be a small silver lining.

"I think it is a bad thing because it affects our momentum to crossing the finish line," explains **Laureen Jandroep, CPC, CPC-I, CMSCS, CHCI**, senior instructor at CodingCertification.org in Oceanville, N.J. "However we can use the extra time to prepare even more thoroughly so we can make the best of it. For those that have made the investment getting ready it is frustrating to see their investment lose traction."

Despite the delay in implementation, experts warn that practices must continue their efforts in preparing for ICD-10 use. "Part of the reason we're in this situation is not enough people have prepared and petitioned for more time," Jandroep says. "It is not fair to those that did prepare and are ready or were going to be by the 10/1/2014 date. The changes are in the implementation date, not that it is not coming at all, so prepare on!"

"Of note, we should not throw away the chance to improve the physician's clinical documentation just because the code set implementation has been delayed," adds **Barbara J. Cobuzzi, MBA, CENTC, CPC-H, CPC-P, CPC-I, CHCC**, president of CRN Healthcare Solutions, a consulting firm in Tinton Falls, N.J. "It is always a goal to improve clinical documentation."

ASC heads up: "ASCs should take advantage of the delay to ensure that software programs will be ready for ICD-10-CM," advises **Sarah L. Goodman, MBA, CHCAF, CPC-H, CCP, FCS**, president SLG, Inc. Consulting. Additionally, payer contracts should be reviewed to determine if ICD-10-CM will be required for diagnosis and CPT® for procedures or whether use of ICD-10-PCS for procedures will be necessary, she says. Most surgery centers bill using CPT® for services performed, but there are a few that also require the ICD-9-CM procedure codes."

Remember: This is the second time ICD-10 implementation has been delayed. The original compliance date of October 1, 2013 was officially pushed back a year on September 5, 2012, by CMS. According to CMS this additional one-year delay of ICD-10 will likely cost the industry an additional \$1 to \$6.6 billion on top of the costs already incurred from the previous one-year delay.

AHIMA's take: The American Health Information Management Association (AHIMA) spoke out against the delay. In a March 31 press release, AHIMA CEO **Lynne Thomas Gordon, MBA, RHIA, CAE, FACHE, FAHIMA**, stated: "On behalf



of our more than 72,000 members who have prepared for ICD-10 in good faith, AHIMA will seek immediate clarification on a number of technical issues such as the exact length of the delay."

The press release went on to say "Since the transition to ICD-10 remains inevitable and time-sensitive because of the potential risk to public health and the need to track, identify and analyze new clinical services and treatments available for patients, AHIMA will continue to help lend technical assistance and training to stakeholders as they are forced to navigate the challenge of continuing to prepare for ICD-10 while still using ICD-9."

Resource: To read the complete text of the Protecting Access to Medicare Act of 2014, visit <http://docs.house.gov/billsthisweek/20140324/BILLS-113hrSGR-sus.pdf>.