

Eli's Hospice Insider

Compliance: Don't Let ICD-10 Trip Up Your Coding Compliance

Start preparing now for October 2014 implementation of the new coding set.

You've known the official date for ICD-10 implementation since last fall, but have you let crucial diagnosis coding prep fall off your to-do list? Compliance with ICD coding conventions should be a priority, since Medicare emphasized the requirement in its 2013 hospice wage index notice (see Eli's Hospice Insider, Vol. 5, No. 9).

You may feel you have some breathing room since providers received a one-year delay for the new diagnosis coding set, but don't let that prevent you from taking necessary steps to get ready for the change, experts warn.

Background: In a final rule published in the Sept. 5, 2012 Federal Register, the **Centers for Medicare & Medicaid Services** finalized its proposed one-year delay to implementation of the new ICD-10 diagnosis coding set. CMS had announced a delay of unspecified length in February 2012, and then last April proposed the one-year deadline bump to October 2014.

"The change in the compliance date is intended to give covered healthcare providers and other covered entities more time to prepare and fully test their systems to ensure a smooth and coordinated transition by all covered entities," CMS notes in the rule. The one-year delay gives providers a break but also minimizes disruption and costs a longer postponement would cause.

Also included in the final rule are plans for a standard unique health plan identifier (HPID), National Provider Identifier (NPI) and the requirements to establish its implementation. This will include a data element that will serve as other entity identifier data (OEID).

What this means for you: You need to ensure that your hospice is ready for ICD-10 and compliant with the NPI, HPID and OEID. Unless there is a smooth transition to the updated medical data code sets and compliance with Version 5010 and ICD-10 by all covered entities, there could be a negative impact on all other industry segments. If any one industry segment fails to achieve compliance, this would result in returned claims and provider payment delays, CMS points out in the rule.

HIPAA benefits: "The adoption of the HPID and the OEID will increase standardization within HIPAA standard transactions and provide a platform for other regulatory and industry initiatives," the rule states.

"ICD-10-CM/PCS implementation is inevitable, but [the delay] gives the healthcare community the certainty and clarity it needs to move forward with implementation, testing, and training," says the **American Health Information Management Association** in a release.

Bright side: While providers prepare for ICD-10 implementation, they don't have to deal with ICD-9 updates. There's a freeze in place until ICD-10-CM replaces ICD-9-CM.

Note: For tips on preparing for the ICD-10 switch, see the next issue of Eli's Hospice Insider.

