

Home Health ICD-9/ICD-10 Alert

ICD-10 News: Stay the Course with ICD-10 Preparations

Delay could prove more costly than continuing with the current implementation deadline.

The home health industry's reaction to the ICD-10 delay has moved from general disbelief to frustration over the lack of concrete information. But experts caution you not to fall back into a holding pattern with your ICD-10 preparations.

Survey Shows Dismay

A survey of healthcare payers and providers attending software company **Edifecs'** February 2012 ICD-10 Summit found that nearly two-thirds of respondents (64 percent) felt a delay would not improve readiness.

The majority of Edifecs survey respondents predicted the delay wouldn't just have a neutral effect on preparedness. 76 percent predicted that a delay would harm other healthcare reform efforts, and 69 percent said a two-year delay would be either "potentially catastrophic" or "unrecoverable."

"The message we heard loud and clear from conference attendees and survey respondents was to keep moving while the industry awaits the final decision on the extended deadline and which entities will be affected," said **Sunny Singh, CEO** of Edifecs in a press release.

Agreed: Many coders and others who have already started their ICD-10 preparation are disappointed and want to move forward with the transition. "The ICD-10 system is so much better at being able to describe a patient's health status and will open up so many avenues that are currently not possible under ICD-9-CM," says **Judy Adams, RN, BSN, HCS-D, COS-C** with **Adams Home Care Consulting** in Chapel Hill, N.C. Improvements under ICD-10 include better documentation, tracking of morbidity, and improved basis for payment decisions, she says.

Don't Kick Back and Relax

Warning: Going back to the procrastination phase with your ICD-10 preparation could set you up for disaster.

Instead, you should take the delay as an opportunity to surge ahead of schedule, rather than finding yourself scrambling to keep up, experts say.

"We are progressing as if the implementation date is still Oct. 1, 2013," says **Therese Rode, RHIT** senior coding manager with **Inova VNA Home Health** in Falls Church, Va.

In other words: "We are continuing with training staff and plans to test 3M's ICD-10 software product," Rode says. "If nothing else, a delay gives us more time to run a dual system."

More Changes: The **Centers for Medicare & Medicaid Services** will propose a rule with changes to the current OASIS document centered on the switch to ICD-10 coding, said CMS's **Pat Sevast** at the **National Association for Home Care & Hospice's** March on Washington conference March 26. The changes aren't expected to be as sweeping as those between OASIS-B and OASIS-C.

While CMS has announced a delay to the implementation of ICD-10, "we are proceeding as if ICD-10 is going to be implemented Oct. 1, 2013," Sevast said. That's because CMS's delay for the new coding set won't be official until it finishes rulemaking.

Delay Could Prove Costly

In a public policy statement, The **American Health Information Management Association** (AHIMA) recommended that CMS rescind the delay and require all healthcare entities to meet the existing compliance date of Oct. 1, 2013.

"The longer the U.S. delays implementation of ICD-10-CM/PCS, the more healthcare data will continue to deteriorate at a time when the need for data integrity is urgent," AHIMA said.

Replacement of the ICD-9 code set is long overdue, AHIMA said in the policy statement. "Continued use of the outdated and broken ICD-9-CM system will increasingly have an adverse impact on the value of healthcare data including the accuracy of decisions based on faulty or imprecise data."

Plus waiting to implement ICD-10 will increase the cost of future implementation because information technology deployed between now and a new deadline will also require conversion, AHIMA said. "Costs of delaying implementation must be considered as well since so many healthcare organizations have already made significant capital and operational investments."

A delay will create added costs because "many healthcare providers and health plans will need to maintain two systems (ICD-9 and ICD-10)," AHIMA says in the list *Ten for 10: Top Ten Reasons We Need ICD-10 Now*. "Delaying ICD-10 increases the cost of keeping personnel trained and prepared for the transition."

Twice the Work: "I feel bad for the educators, the schools who have changed curriculum and expended money to prepare the next generation," Rode says. "Now they are stuck. How long do you keep teaching both systems?"

Waiting for a Date

As of press time, CMS hasn't issued anything definitive regarding a timeline for the delay. And no one really knows what steps will be involved in establishing a new date or how far out that date will be.

Will CMS issue a new proposed rule and hold a comment period before issuing a final rule establishing a new implementation date for ICD-10? Or is there some other method in the works for establishing a new date? The only thing certain is the healthcare industry wants to know the new plan -- and whether any new implementation date will be upheld in the long run.

Biggest lesson: Experts agree the best course of action is to continue on with your education action plan because the delay could be as short as a few months. And even if the delay stretches on, you'll have to start preparing at some point, so why stop preparing at all?

Editor's note: Want to be heard? Email your thoughts about the ICD-10 delay and how your agency is responding to the Home Health ICD-9 Alert editor at janm@codinginstitute.com.