

## Home Health ICD-9/ICD-10 Alert

### ICD-10: Providers Welcome ICD-10 But Blast Implementation Schedule

#### New CMS education tool may help you with the transition.

Grappling with the new diagnosis codes that took effect this month is a hassle, but a much bigger coding headache is coming down the pike soon -- unless influential doctors and payers get their way.

In an August proposed rule, the Centers for Medicare & Medicaid Services (CMS) floated a 2011 implementation date for the new ICD-10 coding system that will replace the current ICD-9 format. The ICD-10 system will increase the number of diagnosis codes from the current 17,000 to a staggering 155,000.

The National Association for Home Care & Hospice (NAHC) submitted comments supporting adoption of ICD 10-CM, agreeing that the new system will greatly improve reporting of health conditions for public health, payment, and quality purposes. However, NAHC urged CMS to ensure adequate provider education beginning now, and recommended that the ICD-10 compliance date be set for a minimum of three years after publication of a final rule but no earlier than Oct. 1, 2012.

The "rapid" timeframe CMS had laid out for full ICD-10 implementation is unworkable, agrees the Medical Group Management Association (MGMA). "The costs associated with implementing ICD-10 in such a short timeframe are markedly higher than what CMS has estimated," MGMA says, based on a study conducted by Nachimson Advisors. The implementation timeframe "will place a major burden on providers, taking valuable time away from their patients and straining other resources needed to invest in health information technology," MGMA insists.

**Too hasty:** The American Medical Association (AMA) "is deeply concerned that HHS is rushing head-first into the transition to a complex coding system without fully recognizing the impact on the health care system," adds AMA board chair **Joseph M. Heyman, M.D.**

Providers aren't alone in opposing the deadline. The Blue Cross Blue Shield Association "has severe concerns about the proposed timeline for conversion to the ICD-10 code sets," says a BCBSA spokesperson. The timeline "could cause a healthcare meltdown that would impose a severe burden on patients, providers, states, government programs as well as health plans." To that end, BCBSA wants a five-year transition to the new ICD-10 system.

More concerns: Home care represented only .06 percent of the impact studies that predicted transition costs, says **Trish Twombly, RN, BSN, HCS-D, CHCE**, director of coding with Foundation Management Services in Denton, Texas. Although the rule states "the adoption of the new codes will likely touch every provider who submits diagnostic codes and every payer that processes health care claims," it goes on to say, "without more details we cannot conclusively determine the extent of the system conversion costs of long term care facilities, home care providers, and other non-hospital organizations. It may be that the system conversion costs for these types of health providers are underrepresented."

Reading this type of verbiage in the proposed rule "deeply troubles me," Twombly says. "Home care will have tremendous costs in staff education, software conversions, and lost productivity, to name just a few areas, and yet our industry was not included in the conversion cost studies."

On the other hand, the newest version of OASIS-C published on Nov. 14, includes the requisite number of spaces for the sometimes seven-digit codes required by ICD-10-CM, so obviously Medicare is preparing for the change, says **Lisa Selman-Holman, JD, BSN, RN, HCS-D, COS-C**, consultant and principal of Selman-Holman & Associates in Denton, Texas. The conversion to ICD-10-CM in home health means form conversions, software conversions, and a whole new update to the PPS since the existing case mix codes will no longer exist, she says.

## Hear the Other Side

But the American Health Information Management Association (AHIMA) endorses CMS' timeline. "Obviously the cost of implementation for ICD-10 will only grow the longer we delay initiating that process," AHIMA says. The Nachimson study MGMA cites is biased, the association contends.

"There's never a good time or enough time to do a conversion like this," says **Bob Wardwell**, vice president of regulatory and public affairs for the Visiting Nurse Associations of America. "The training and systems changes needed to accommodate this [conversion] would warrant more time, a much better orientation of the field than the Department of Health and Human Services has provided, and a commitment to fund the changes."

The key to transitioning is training for all staff, which is doable by 2011, says **Judy Adams** of LarsonAllen in Chapel Hill, N.C. But the more critical area may be the ability to have all of the electronic changes made to accept a different code structure in electronic records and paper forms, plus the re-programming for agencies to have the new ICD-10 coding information incorporated within their systems.

**On the other hand:** "I believe the clinicians who tell me that ICD-10 is a much better, more specific, and modern classification system -- and [the conversion] needs to be done," says Wardwell. But putting in place things such as a clear cross-walk between ICD-10 codes and all the ICD-9 codes that are integral with the HHPS system should be done before HHS decrees a conversion time line, he adds.

"I am looking forward to [the conversion] because of the greater specificity for coding and the opportunity to code situations that are difficult to code under ICD-9," Adams says. Two of the most positive aspects of ICD-10 are the concept of laterality that will allow coders to indicate which side of the body is involved (or whether the condition is bilateral) and the combination of a number of situations into one code, such as the location and stage of a pressure ulcer. This greater specificity will enable home health coders to clearly document their patients' situations and really help to support the appropriateness of home health and hospice care, Adams says.

**Resource:** You can order a transcript or CD copy of the recent **Eli**-sponsored audioconference, "ICD-10 Preparation: What You Need To Know NOW," by calling 1-800-508-2582.

Also, CMS offers an ICD-10-Clinical Modification/Procedure Coding System Bookmark, which explains the ICD-10 system, "including the benefits of adopting the system, recommended steps to be taken in order to plan and prepare for implementation of the system, and where additional information about the system can be found." To place your order, visit, [www.cms.hhs.gov/MLNProducts/01\\_Overview.asp](http://www.cms.hhs.gov/MLNProducts/01_Overview.asp) scroll down to "Related Links Inside CMS," and select "MLN Product Ordering Page."