

Home Health ICD-9/ICD-10 Alert

ICD-10 Update: Hurry Up and Wait: HHS Confirms ICD-10 Postponement

Delay could offer additional time to prepare for new diagnosis coding system.

As of three months ago, the **Centers for Medicare & Medicaid Services** were holding fast to the Oct. 1, 2013 ICD-10 implementation date -- but now they're whistling a different tune.

The **Dept. of Health and Human Services** (HHS) announced on Feb. 16 that the ICD-10 implementation date will indeed be postponed -- at least for some providers. The agency stated that it "will initiate a process to postpone the date by which certain health care entities have to comply with International Classification of Diseases, 10th Edition diagnosis and procedure codes (ICD-10)."

"ICD-10 codes are important to many positive improvements in our health care system," said HHS Secretary **Kathleen Sebelius** in a statement. "We have heard from many in the provider community who have concerns about the administrative burdens they face in the years ahead," Sebelius said. "We are committing to work with the provider community to reexamine the pace at which HHS and the nation implement these important improvements to our health care system."

The announcement followed hints that CMS was planning a pushback. On Feb. 14, acting CMS administrator **Marilynn Tavenner** said she intended to "re-examine the pace at which we implement ICD-10," which would require the agency to go through the standard federal rulemaking process. Tavenner made her comments to great applause at the **American Medical Association's** National Advocacy Conference, attendees said.

Questions about the Delay Abound

As of press time, neither the HHS nor CMS has announced just how much of a delay will take place or who might be affected. "It is hard to believe that CMS is changing after their absolute position for more than two years," says **Judy Adams, RN, BSN, HCS-D, HCS-O, COS-C**, with **Adams Home Care Consulting** in Chapel Hill, N.C. The HHS announcement also seems to imply that only some entities will have a delay, Adams points out. Will it be just physicians or will other providers be included in the delay as well?

CMS had already stated that systems will have to be able to use ICD-9-CM and ICD-10-CM for a time anyway to process any claims before October 1, 2013, so perhaps there will be some healthcare entities transitioning on October 1, 2013, says **Lisa Selman-Holman, JD, BSN, RN, HCS-D, COS-C, HCS-O**, consultant and principal of **Selman-Holman & Associates** and **CoDR -- Coding Done Right** in Denton, Texas. Maybe those providers who are not ready, namely the physicians, will have more time to transition, she suggests. There are many theories, but we won't know the plans until CMS publishes proposed rulemaking in the Federal Register, she adds.

"The United States has long been behind the rest of the world in diagnosis coding. Nations already using ICD-10 are getting ready to transition to ICD-11 on October 1, 2015," Selman-Holman says. Could it be that we are going to switch gears, skip ICD-10-CM and instead transition to ICD-11 with the rest of the world? ICD-11 is built on a foundation of ICD-10 so without ICD-10 it will be much more difficult to transition to ICD-11 according to some experts.

"Continuing to use an antiquated system like ICD-9-CM increases the regulatory burden," Selman-Holman says. "Health plans, hospital systems and other payors and providers, including HHS, have spent millions of dollars readying for ICD-10-CM. A delay now will increase the money spent and the time spent."

Continue to Work Toward Transition

Sebelius's announcement appears to fall short of the AMA House of Delegates' original recommendation last fall, which

was for a full repeal of ICD-10. However, a slower pace could at least buy time for providers that have not yet considered the impact of ICD-10 on their systems. But those already preparing for the change are frustrated by the HHS announcement.

"This week's announcement from Health and Human Services (HHS) to pursue a delay was indeed a disappointment for all of us who have worked so hard to support the implementation of ICD-10," said **Lynne Thomas Gordon, MBA, RHIA, FACHE**, chief executive officer with the American Health Information Management Association (AHIMA) in a statement.

AHIMA will be "reaching out to those making the decisions to educate them about the importance of ICD-10 and encourage them to keep this delay as short as possible," Gordon said.

To help communicate the positive benefits of transitioning to ICD-10, AHIMA has developed a list -- Ten for 10: Top Ten Reasons We Need ICD-10 Now -- "to help demonstrate how the delay will impact progress and resources that have already been invested in the transition," Gordon said in another statement.

"One of the first places we need to speak up is in the organization where we are employed. Already, surveys are being taken by employer associations like the American Hospital Association and other employers, both providers and health plans, to determine readiness," Gordon said. "We need you and your employer to tell HHS and others of this commitment in order to back up our message of no delay and continued implementation."

Stay on track: Despite the announcement of a slower timeline, you should continue to work toward compliance with the new diagnosis coding system, which appears to still be in place for future implementation. Experts advise you to stay diligent in your training.

But don't be surprised if HHS keeps you hanging on the final ICD-10 implementation date. Due to politics, a decision on the final deadline may not come until after the presidential election concludes this year, experts predict.

Watch future issues of Home Health ICD-9 Alert for more on this topic as CMS releases additional information about the adjusted ICD-10 timeline.

Read more: Find Sebelius' statement here: www.hhs.gov/news/press/2012pres/02/20120216a.html and AHIMA's "10 Reasons" here: www.ahima.org/downloads/pdfs/pr/Tenfor10.pdf