

Home Health ICD-9/ICD-10 Alert

ICD-10 Update: Surprise: ICD-10 Deadline Extended

Don't let your preparations lag.

The pressure is off. In an unexpected turn of events you'll have at least another year to prepare for ICD-10. On April 1, **President Obama** signed into law a bill that in part extends the code set transition until at least Oct. 1, 2015.

Background: On March 27, Congress attempted to dodge the March 31 expiration of a delay to a pending physician pay cut by introducing the Protecting Access to Medicare Act of 2014. This bill would halt the planned 24 percent pay cut for the rest of the year. However, the temporary "doc fix" wasn't the only feature of the legislation. It also included a controversial addition that caught the eye of almost everyone who has been working hard to prepare for ICD-10.

ICD-10 Delay Buried in Text

Mentioned about one-third of the way into the 121-page bill is a short paragraph that states, "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."

Needless to say, professional organizations disagreed strongly with the bill. "AHIMA officials have said that another delay in ICD-10 will cost the industry money and wasted time implementing the new code set," the **American Health Information Management Association** said in a March 27 statement.

Even the **American Medical Association** — which has long advocated for an ICD-10 delay — urged Congress to vote "no" on the bill, although the AMA's opposition was more focused on the financial provisions. "Full repeal of the sustainable growth rate formula is the answer to strengthening the Medicare program, not another patch," AMA president **Ardis Dee Hoven** said in a March 26 statement.

Despite the pushback from all sides of the medical community, the House of Representatives approved the bill. On March 31, the Senate followed suit, and President Obama signed the bill into law on April 1.

Home Health Industry Responds

Home health coders expressed shock at the sudden extension of a deadline they believed was unchangeable. But experts expect some agencies to benefit from the delay.

"As an industry, we seem to habitually be behind the times and late adopters," says **Andrea L. Manning, BS, RN, HCS-D, COS-C**, with **Manning Healthcare Group** in Talkeetna, Alaska. "The fact of the matter is that although some agencies have invested a substantial amount of time and money into preparing for the ICD-10 transition, many agencies have not. Those agencies are breathing a sigh of relief, while those who have been preparing all along, are disappointed."

Home health agencies should "continue training and extend [their] implementation calendar to include another year of practice," says **Delaine Henry, COS-C, HCS-D**, with **Health Care Management and Billing Services** in Lafayette, La. "This takes the pressure off of smaller agencies who had a hard time finding funds to attend seminars with the larger consulting groups. This delay will give those agencies a chance to utilize the free training set up by CMS that is available via their site and YouTube."

"Use the extra time to your advantage by improving documentation and clinical knowledge of your assessing clinicians and coders," says **Lisa Selman-Holman, JD, BSN, RN, COS-C, HCS-D, HCS-O**, AHIMA Approved ICD-10-CM Trainer/Ambassador of **Selman-Holman & Associates, LLC, CoDR** **Coding Done Right and Code Pro** University in Denton, Texas. "If you've already had ICD-10 training, continue to dual code, just not on as frequent a basis, to ensure

that you don't lose what you've gained."

Take note: "The Coordinating Committee has made a lot of changes to ICD-10 over the last few years leaving one to wonder if they use the same interpretations for ICD-9," Selman-Holman says. "Although we have a code freeze, as coders we need to keep up with interpretations."

Questions Remain

Although the delay is a fact, how long it will last and what impact it will have on other upcoming home health changes is undecided.

"AHIMA will seek immediate clarification on a number of technical issues such as the exact length of the delay," said **AHIMA CEO Lynne Thomas Gordon, MBA, RHIA, CAE, FACHE, FAHIMA**. "AHIMA will continue our work with various public sector organizations and agencies such as the Centers for Medicare and Medicaid Services (CMS), the Office of the National Coordinator for Health IT, and the National Center for Health Statistics (NCHS) along with our industry partners such as the ICD-10 Coalition so that ICD-10 will realize its full potential to improve patient care and reduce costs. These are goals that AHIMA and other healthcare stakeholders and our government leaders all share," Thomas Gordon said in Journal of AHIMA web post.

The new deadline isn't the only unsettled detail that has home health coders wondering. Specifics as to how this extension will impact coding credentials and the anticipated move to OASIS-C1 are also up in the air. Credentialed coders will need to maintain their ICD-9-CM certification and may desire to continue to work to attain ICD-10-CM certification.

The need to transition from the current OASIS-C to the new OASIS-C1 was originally inspired by the need to accommodate new, alpha-numeric, seven-character ICD-10 codes. The transition for this new assessment form was also planned for Oct. 1. With the ICD-10 deadline delayed, it seems likely the OASIS-C1 transition date will also shift. As of press time, the **Centers for Medicare & Medicaid Services** had yet to announce how a new ICD-10 deadline would impact the move to OASIS-C1.

"It is a little early in the game to know exactly what the future holds regarding OASIS C-1 changes, but what we do know is that the projected changes will still happen at some point," says **Pat Jump** with Rice Lake, Wis.-based **Acorn's End Training & Consulting**. "The changes are not eliminated, just delayed."

Home health coding credentialing entities also have yet to announce how the extension will impact home health coders who have credentials near to expiring.

"Although ICD-10 has been delayed, the need for operational efficiencies, regardless of the coding set, is a must in order to meet the ongoing financial challenges and payment cuts that we face in the home health industry," Manning says. As home health agencies face a 3.5 percent annual payment cut over the next four years, taking a closer look at the operational and financial processes that will be impacted by ICD-10 can lead to greater efficiency in the meantime, she says.

Coders should also continue to seek out ICD-10 training, experts agree. "Getting your education in ICD-10 will just make you better at ICD-9," Selman-Holman says. "There are more guidelines and conventions that are the same than are different."

Plus, now there's a need for additional training in ICD-9. "Coders still need training," said **Linda Krulish, PT, MHS, COS-C** and **Sparkle Sparks, PT, MPT, COS-C, HCS-D**, AHIMA Approved ICD-10-CM Coding Instructor in an **OASIS Answers** blog post. "Since many seasoned ICD-9 coders left our ranks because they weren't interested in 'enduring one more change,' a large influx of brand new coders are making the coding decisions in our agencies and for our industry."

"Don't drop ICD-10 training but instead, based on the needs of the coders in your agency, consider adding ICD-9 training back into the mix to support your newer coders," Krulish and Sparks said.

