OASIS Alert

ICD-10: Don't Wait: Begin Your ICD-10 Transition and Stay Ahead of the Game

Four phases set the milestones for your ICD-10 transition.

Staying on top of ICD-9 and OASIS updates may have you leaving ICD-10 preparation on the back burner, but don't fall into that trap.

Health care providers that have begun the first phase of ICD-10 transition have been surprised -- not by how quick and easy the adjustment will be, but by the process's vast nature. If you aren't one of the providers that have already started, it's time to get on the ICD-10 train.

Procrastinators beware: ICD-10 will take effect on Oct. 1, 2013, and the **Centers for Medicare & Medicaid Services** will not offer a grace period after that date. In other words, you'd better have your ICD-10 systems up and running before that date so your claims continue to flow smoothly.

That's the word from a Jan. 12 CMS-sponsored ICD-10 National Provider Teleconference, where CMS's **Pat Brooks** reiterated that ICD-10 will be used by all providers in every health care setting for dates of service on or after Oct. 1, 2013, and ICD-9 codes will no longer be accepted.

No early implementation: Go-getters who want to get a jump-start on using ICD-10 won't be able to submit those codes before Oct. 1, 2013. "You cannot decide to submit ICD-10 codes earlier than the implementation date," Brooks told attendees.

Start Preparing Right Now

Every month is a busy month in home health, but it is paramount that you make time for your ICD-10 preparation sooner rather than later, experts say. "A key takeaway message from today's session is the absolutely critical importance of not delaying in getting this implementation process started," **Sue Bowman** with the **American Health Information Management Association** said during the call.

You need to institute a well-planned implementation process to be ready in 2013, rather than quickly scrambling your ICD-10 program together at the last minute.

You should break your ICD-10 implementation planning program into four phases, Bowman advised. She suggested these timelines:

Phase 1: Implementation plan development and impact assessment: This phase is suggested to span from the first quarter of 2009 through the second quarter of 2011

Phase 2: Implementation preparation: Suggested to take place between the first quarter of 2011 and the second quarter of 2013

Phase 3: "Go live" preparation: Should potentially take place between the first and second quarters of 2013

Phase 4: Post-implementation follow-up: Suggested to occur between the fourth quarter of 2013 and fourth quarter of 2014.

Ideally, your phase one work "should be nearing completion or at least be well underway," Bowman said in the call. "For those of you who may not have gotten started yet or who have barely gotten started, I urge you to move forward with

this as quickly as possible."

Here's why: You won't be able to schedule phases two through four until phase one is completed, and you need to be able to calculate the resources you'll need for those subsequent phases. "Until you know the scope of the impact of ICD-10 in your organization, you don't know how much time and resources are going to be needed to complete the preparation activities, so you don't want to wait too long before making that assessment," Bowman said.

"Most people are finding that you would be very surprised at some of the places that are impacted by the transition, and this project is bigger than they expected," Bowman noted. "So the earlier you understand that so you allow sufficient time to actually make these changes, the better off you'll be and the more prepared you'll be for the compliance phase."

Implement Your Phase One Steps

Being well on your way into your phase one ICD-10 planning includes establishing an interdisciplinary steering committee to oversee the entire process at your organization. For a small provider, this committee will include just a few people, but it's still important to know who's steering the ICD-10 planning ship, Bowman advised.

In addition, during phase one, you'll formulate your transition strategies, identify goals, and offer ICD-10 awareness education to the rest of your organization. "This is basically to alert various key departments, managers, and senior executives in your organization about the transition to ICD-10, and some key information they need to move forward with this process," Bowman said.

For instance: Your IT department may need information on ICD-10's regulatory requirements, your billing staff should learn the value of the new code sets, and the entire organization should know how ICD-10 fits in with other initiatives, as well as the differences between ICD-9 and ICD-10. Coders should become familiar with the structure, organization, and features of ICD-10. Once you identify key ICD-10 transition tasks and objectives, you'll be able to develop a detailed project plan, including internal implementation timelines and specifying resources you'll need to complete the tasks that you identify as being necessary at your organization.

Know where it counts: During phase one, you should identify the reports and forms that will require modification once ICD-10 takes effect (such as intake and OASIS forms). Plus, you'll need to know which processes will need to be altered.

Vendor contact: Your business associates, including systems or billing vendors, should let you know what their ICD-10 readiness plans are, and whether any upgrades or replacements will be required for ICD-10 use.

Know your budget: During phase one, you'll also want to identify what it will cost you to transition to ICD-10, Bowman said. This will include an assessment of software modifications, education, hardware/software upgrades, staff time, temporary or contract staffing, consulting services, report redesigns, reprinting of paper forms, data conversion, and other potential resources.

Note: To view the entire presentation from the ICD-10 call, which outlines the four phases and what each phase includes, visit www.cms.gov/ICD10/Downloads/Jan122011_ICD10_Call.pdf.