

Health Information Compliance Alert

Diagnosis Coding: Most Practices 'Surprised' By How All-Encompassing ICD-10 Transition Has Been

Best bet: Establish your initial plan for conversion immediately so you can project your practice's timeline.

Medical practices and organizations 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 practices that has already started, it's time to get on the ICD-10 train.

Procrastinators beware: ICD-10 will take effect on Oct. 1, 2013, and CMS 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' **Pat Brooks, RHIA**, reiterated that ICD-10 will be used by all providers in every healthcare 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 jumpstart 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 said.

Important: The transition to ICD-10 will have no impact on CPT or HCPCS code use, Brooks said. "Both of these coding systems will continue to be used as they are now."

Start Preparing Right Now

"A key takeaway message from today's session is the absolutely critical importance of not delaying in getting this implementation process started," said American Health Information Management Association's **Sue Bowman, RHIA, CCS**, 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.

Here's how: You should break your ICD-10 implementation planning program into four phases, Bowman advises, as follows with suggested timelines:

Phase 1: Implementation plan development and impact assessment: 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. "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

As noted above, you should be well on your way into your phase one ICD-10 planning at this point, which includes establishing an interdisciplinary steering committee to oversee the entire process at your practice. In a small medical practice, 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 practice. "This is basically to alert various key departments, managers, and senior executives in your organization about the transition to ICD10, 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 practice should know how ICD-10 fits in with other initiatives, as well as the differences between ICD-9 and ICD-10. Your staff's coders should become familiar with the structure, organization, and features of ICD-10-CM.

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 superbills and intake forms). Plus, you'll need to know which processes will need to be altered (such as registries, performance measures, etc.).

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 your practice 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.

Resource: 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.