



ICD-10 Stakeholder Collaboration Meeting Summary

On July 15, 2013, the Centers for Medicare & Medicaid Services (CMS) convened a stakeholder collaboration meeting to hear from associations representing the health care industry about the transition to ICD-10. Participants provided their perspectives and insights about how to help the industry implement ICD-10 by the October 1, 2014, compliance deadline.

Participants

Industry participants included associations representing providers, payers, and vendors:

- America's Health Insurance Plans (AHIP)
- American Academy of Family Physicians (AAFP)
- American Academy of Professional Coders (AAPC)
- American Clinical Laboratory Association (ACLA)
- American College of Cardiology (ACC)
- American College of Obstetricians and Gynecologists (ACOG)
- American College of Physicians (ACP)
- American Hospital Association (AHA)
- American Health Information Management Association (AHIMA)
- American Medical Association (AMA)
- American Nurses Association (ANA)
- Association of American Medical Colleges (AAMC)
- Blue Cross Blue Shield Association (BCBSA)
- Cooperative Exchange
- Federation of American Hospitals (FAH)
- Healthcare Billing and Management Association (HBMA)
- Healthcare Information and Management Systems Society (HIMSS)
- Medical Group Management Association (MGMA)
- National Association of Community Health Centers (NACHC)
- National Association of Rural Health Clinics (NARHC)
- North Carolina Healthcare Information and Communications Alliance (NCHICA)
- Professional Association of Health Care Office Management (PAHCOM)
- Workgroup for Electronic Data Interchange (WEDI)

CMS participants included representatives from the CMS Offices of Enterprise Management, including the Office of E-Health Standards and Services and the Office of Enterprise Business, as well as representatives from the Office of Information Services and the Center for Medicaid and CHIP Services. CMS contractors included representatives from Ketchum, National Government Services, and Noblis. HHS participants from the ICD-10 Enterprise Workgroup included the Centers for Disease Control & Prevention, Health Resources and Services Administration, National Institutes of Health, Substance Abuse and Mental Health Services Administration, and the U.S. Food and Drug Administration.



Key Discussion

During the discussion, CMS:

- Affirmed that the October 1, 2014, compliance deadline is firm;
- Reiterated that an enforcement discretion period is not an option for ICD-10;
- Discussed its extensive outreach to diverse industry groups to ensure successful ICD-10 implementation across the industry; and
- Furnished insights about the technical assistance it is providing to Medicaid agencies.

Stakeholders discussed specific challenges and concerns about the ICD-10 transition, and offered recommendations for helping the industry move forward. CMS and the stakeholders committed to working together toward a successful and timely transition.

Challenges/Concerns

Specific concerns participants raised about the ICD-10 transition included:

- Vendor readiness; participants reported that many providers have not received updates from their vendors and are looking for ways to better coordinate vendor product installation and testing before the October 1, 2014, deadline.
- Timing for the release of local coverage determinations (LCDs); many felt the April 2014 release date is too late. (The October 2013 timing for national coverage determinations [NCDs] was considered appropriate.)
- CMS' June 2013 statement that Medicare Administrative Contractors (MACs) are not planning to conduct end-to-end testing with trading partners. (CMS noted that decision-makers were reconsidering the Medicare position on testing.)
- Readiness of rural and small community hospitals, home health agencies, and rehab facilities for the ICD-10 transition.
- The processes in place for payers to communicate with providers about the status of their claims.
- How to ensure non-covered entities like workers' compensation and auto insurers make a timely transition.
- How to handle organizations that are not ready when ICD-10 hits October 1, 2014; for example, how can providers address payers that are not ready for the ICD-10 deadline, and how can payers handle providers who are not ready.
- Survey fatigue; many industry organizations are being bombarded with different ICD-10-related surveys to distribute to providers, health plans, and vendors.



Recommendations

Industry associations provided recommendations for helping the industry move forward with the ICD-10 transition.

- Develop and disseminate more information on best practices (for example, best practices on testing, addressing ICD-10 implementation challenges, and leveraging financial resources to ensure continuity of operations).
- Continue to emphasize the October 1, 2014, compliance deadline for ICD-10 and communicate a sense of urgency around the transition; explain *why* industry needs to be preparing now.
- Leverage ICD-10 resources that have already been developed by CMS and stakeholder leaders instead of creating an extensive set of new materials.
- Ensure consistent, coordinated messaging from CMS and stakeholder leaders across the country; this will help make sure the industry does not receive conflicting messages or information.
- Leverage a range of communication vehicles, such as major news outlets and EOB statements, to reach industry with information about ICD-10.
- Develop a standard survey questionnaire on ICD-10 readiness and preparedness that organizations can distribute so the data is comparable; also, think about alternative methods to obtain information from the industry to prevent survey fatigue.
- Develop a voluntary ICD-10 accreditation program for vendors. (Stakeholder groups such as WEDI offered to work together with other associations to establish standards for this program.)
- Continue to communicate and work with professional associations and provider specialty groups to address some of their unique requirements.
- Prepare to address post-implementation issues.