



A Series of Topics on ICD-10 for State Medicaid Agencies:

1. What is ICD-10?
2. Regulatory Requirements
3. Benefits of Using ICD-10
4. Further Movement along the MITA Road Map - Use of Clinical Data and Interoperability
5. Effective Implementation of ICD-10
6. **Potential Programmatic and Technical Problems**
7. Impact on MITA Business Processes
8. Forming the Implementation Team
9. The Implementation Team that Gets It Right
10. Where Are You in this Process and Timeline?
11. Partner and Vendor Considerations
12. Post Compliance Date Actions
13. Education and Training Processes

ICD-10: Getting It Done ... Right



ICD-10 Planning and Assessment

An Informational Series on ICD-10
Planning and Assessment for State
Medicaid Agencies

Training Segment 6 Potential Programmatic and Technical Problems

Segment 6 – Potential Programmatic and Technical Problems

Objectives of this Segment

- ▶ Identify Potential Programmatic and Technical Issues
- ▶ Prepare to Resolve Them

Resource Issues - Internal

- ▶ Occurring at a difficult time for Medicaid Agencies
- ▶ Pressures exist for cost cutting and health care reform
- ▶ Other major projects also occurring – HIPAA version upgrades, health information exchanges, interoperability with EHRs
- ▶ Resource distribution and management is critical to achieving goals of these projects
- ▶ May need to get creative

Resource Issues - External

- ▶ Will be competition for ICD-10 experts throughout the industry, not just in Medicaid
- ▶ Note that all States will be going thru this at the same time
- ▶ Opportunity for cooperatives for both ICD-10 expertise and MMIS expertise.

Program Issues

- ▶ How to predict impacts of code changes on budgets?
- ▶ Changing relationships with providers
- ▶ Beneficiary issues
- ▶ Redefining coverage using codes
- ▶ Changing waiver programs

Training Issues

- ▶ Internal staff will need to be trained – how do you avoid loss of productivity?
- ▶ Who is responsible for training providers and vendors?

Transition Issues

- ▶ Tracking provider readiness
- ▶ Tracking other partner readiness
- ▶ Denying the use of ICD-9 codes after Oct 1

Non-HIPAA Partners

- ▶ Dealing with atypical providers
- ▶ Dealing with workers comp
- ▶ Dealing with other State agencies

Technical Issue – Remediate or Replace

- ▶ Look at the range of changes necessary (assessment)
- ▶ Determine approximate costs of remediation vs. replacement
- ▶ Make appropriate decision based on analysis

Technical Issue - Crosswalks

- ▶ What is a crosswalk?
 - A tool which attempts to match ICD-10 codes to ICD-9 codes.
 - This is being looked at as an easy solution for ICD-10 implementation
 - Is it?

Crosswalk Issues – No Perfect Crosswalk

- ▶ Remember that ICD-10 has many changes from ICD-9
- ▶ Greater specificity is only one of those changes
- ▶ There are many other changes which make comparing ICD-10 to ICD-9 difficult.
 - Example – asthma
 - ICD-9 classifies asthma by intrinsic and extrinsic
 - ICD-10 classifies asthma as mild, moderate, and severe
- ▶ No easy way to translate one to the other.

Crosswalk Issues – Loss of Information

- ▶ ICD-10 codes contain significantly more and different information than ICD-9 codes.
- ▶ If crosswalking could be done, this additional information would be lost
- ▶ This minimizes the benefits of the ICD-10 code set usage.
- ▶ Also, it negates the efforts that providers make to code in ICD-10.

Crosswalk Issues - Understanding

- ▶ There is no crosswalk that has been developed for all codes.
- ▶ NCHS and CMS have developed General Equivalence Maps or “GEMs”
- ▶ These show the relationships between ICD-9 and ICD-10 codes.
- ▶ Web links to GEMs
 - Diagnoses - http://www.cms.hhs.gov/ICD10/02m_2009_ICD_10_CM.asp
 - Procedures - http://www.cms.hhs.gov/ICD10/01m_2009_ICD10PCS.asp

Don't Use Crosswalks for Production

- ▶ Avoid use of crosswalks as a production tool
- ▶ Do some testing of current systems against crosswalked ICD-9 data
- ▶ Learn to speak ICD-10

What Are Crosswalks Good For?

- ▶ Tool to learn differences and similarities between ICD-9 and 10 codes
- ▶ As a simulation exercise to compare impact of ICD-10 on current systems
- ▶ Way to compare historical ICD-9 data with new ICD-10 data.

Contingency – Not According to CMS

- ▶ Contingency periods have been used in prior HIPAA implementations
- ▶ CMS has been very emphatic that they will not be available for ICD-10
- ▶ The compliance deadline must be met, or there will be difficulties after Oct 1, 2013

Summary

- ▶ There are a number of issues which need to be considered in the ICD-10 implementation.
- ▶ These should be kept in mind as you do your assessment and create your strategy.
- ▶ Focus on making the end date – no contingency period is expected to be granted.