

DPH ICD-10-CM Implementation Project - Progress Report
NCALHD Technology Committee

May 23, 2012

ICD-10 Compliance

- A proposed rule change to delay ICD-10 compliance for one year to 10/1/2014 was published April 17th in the Federal Register (attached) and the comment period closed on 5/17/12. Many state and national organizations have submitted comments on the proposed rule including
 - American Health Information Management Association (AHIMA) – no delay
 - NC Healthcare Information and Communications Alliance (NCHICA) – one year delay is acceptable but the extra time should be used for testing between providers and payers
 - American Medical Association (AMA) – recommends at least a 2 year delay and wants CMS to look at alternatives to ICD-10
 - Tennessee Medical Association – one year delay is acceptable
 - Workgroup for Electronic Data Interchange (WEDI) - The proposed one-year delay in the compliance date for ICD-10 would give vendors extra time to develop products needed for compliance initiatives; any deadline extension should be used to conduct more robust evaluations and testing of the medical code set.
 - The Federation of American Hospitals (FAH) indicated cautious support for the proposed one-year extension of the ICD-10 compliance date. The group is wary after experiencing the uneven start surrounding implementation of the 5010 deadline earlier this year, when not all industry segments were prepared. FAH is recommending that CMS establish milestones a year in advance to measure industry readiness for the ICD-10 switch.
- Anticipate final rule will be published in July or August 2012 and some decisions related to the Project Schedule have been made based on that assumption.

Deliverables

- A Business Impact Assessment Tool was piloted within one area of DPH, by the Raleigh CDSA and by Johnston County Health Department and was modified based on pilot results.
 - The tool will aid DPH and local agencies to identify all business processes within the agency that have ICD-10 impacts and the type of impacts can be identified (e.g., reports, forms).
 - The DPH ICD-10 Implementation Team has determined that
 - dissemination of the tool statewide should be delayed until a final rule is published and the compliance date is finalized; however, local agencies can request the tool if they wish to proceed with the assessment
 - agency business processes may change over the next few months as agencies implement changes for Meaningful Use compliance, install software for electronic medical records, etc. so delaying the impact assessment seems prudent
 - training on use of the tool should be developed during the interim period and offered to DPH and local agencies based upon the final compliance date
- The ICD-10-CM Training Plan has been completed, approved, sent to agency ICD-10 contacts and posted to the website.
 - Provides more detailed information about the type of training that has been and continue to be developed
 - Dates for most of the training will not be identified until the compliance date is finalized.
- “Introduction to ICD-10” training is complete and is posted on the website. This training is very high level and can be used for staff, committees, regional groups, etc. to orient individuals to ICD-10 (e.g., why the change is being made, what is being changed, how will staff be impacted, what assistance will be provided by DPH).
- The DPH ICD-10 Implementation Project Manager has started development of ICD-10-CM comprehensive training modules, beginning with the Basic training module which has been reviewed by DPH ICD-10 Implementation Team members.

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- Members of the DPH ICD-10 Implementation Team have provided numerous training scenarios that will be incorporated into the ICD-10-CM training modules as practice exercises. The scenarios have been sent to the ICD-10 contacts statewide and **local agencies are encouraged to submit additional scenarios that represent the majority of client conditions encountered locally.**

Plans for Next Month

- Finalize development of the Clinical Documentation Assessment tool and process so the DPH ICD-10 Implementation Team can proceed with the pilot of the tool and process in August 2012.
- Continue development of the ICD-10-CM Comprehensive training modules in an effort to train members of the DPH ICD-10 Implementation Team in July 2012 (this training is a pre-requisite for conducting the Clinical Documentation Assessment pilot).

Project Management

- The DPH ICD-10 Implementation Project information has been moved from the HIS website to the DPH website under the major category, Local Health Departments (<http://publichealth.nc.gov/lhd/icd10/>). The ICD-10 contacts have been informed of the change.
- If the compliance date is extended, the current baselined Project Schedule will be modified and re-baselined. Some benefits of the proposed delay would be:
 - Additional time to modify/enhance training materials
 - Additional time to pilot the use of a Learning Management System (LMS) to determine if a LMS will be a viable solution for coding training
 - Delay all planned training for DPH staff and local agencies by 6 months – this will give DPH staff and local agencies additional time to do their Clinical Documentation Assessments and develop internal Clinical Documentation Improvement initiatives, test system changes, test with third party payers, etc.
- The projects Lessons Learned template and process has been approved and items will be captured on an ongoing basis until the project is completed.