August 2014

ICD-10: Getting Ready for October 1, 2015

The Department of Health and Human Services (HHS) issued a final rule on July 31, 2014 setting the compliance date for the transition from ICD-9-CM to ICD-10-CM diagnostic code sets and ICD-9-PCS to ICD-10-PCS hospital procedural code sets to October 1, 2015. (Only ICD-9-CM and ICD-10-CM affect physician claims). The compliance date had been set for October 1, 2014 but due to concerns as to the health care industry's readiness, the Centers for Medicare and Medicaid Services (CMS) was required by the Protecting Access to Medicare Act of 2014 to set the compliance date to be no sooner than October 1, 2015. CMS set the transition date at the earliest allowable date. The agency cited that a delay longer than a year would slow or even stop progress towards the transition to ICD-10, and could render current ICD-10 system updates and releases obsolete.

Due to the delay in the transition from ICD-9-CM to ICD-10-CM, the ICD-9-CM Coordination and Maintenance Committee (C&M) that oversees the diagnostic code sets placed a partial freeze on any code changes made to the code sets. The last regular annual update to the two code sets took place on October 1, 2011. On October 1, 2014 and October 1, 2015, there will be limited code updates to ICD-10-CM to capture new diseases. Regular annual updates to ICD-10-CM begin on October 1, 2016. Updates to ICD-9-CM will no longer take place since this code set will become obsolete.

To prepare for the transition to ICD-10-CM, CMS has developed many sources of information to make the transition easier. One educational source that provides valuable information on a variety of topics is *MLN Matters*®, short for *Medicare Learning Network*®. For the transition to ICD-10-CM, *MLN Matters*® *Number: SE1408 Revised* provides instructions on how claims should be submitted when services span the transition dates of September 30, 2015 and October 1, 2015. In *Table C* of this bulletin, CMS provides specific instructions on how to report anesthesia services that begin on 9/30/2015 and ends on 10/1/2015. CMS instructs the provider of anesthesia to report the service using ICD-9-CM diagnosis codes and on the claim form the FROM and THROUGH dates should both be reported as 9/30/2015.

MLN Matters® memo, *Number: SE1409 Revised* provides important information for those who submit claims to CMS. In order to insure that your claims
are going to be accepted by CMS when ICD-10-CM is implemented, it is necessary to test your claims processing system prior to that date. CMS refers to this type of claims testing as acknowledgement testing, since you will obtain an acknowledgment that your claim was received. Whether it is your practice, a billing

company or a clearinghouse that submits claims on your behalf, it is up to you to make sure your claims will be accepted by CMS' system on October 1, 2015. CMS has indicated that providers, billing companies and clearinghouses are welcome to submit acknowledgement test claims anytime up to the October 1, 2015 date. In addition, CMS will be offering three separate weeks of acknowledgment testing when submitters will be given the opportunity to talk with real-time help desk support if a problem arises during the testing process. The test weeks will occur in November 2014, March 2015, and June 2015.

For additional information on acknowledgment testing, refer to the information on your Medicare Administrative Contractor's website.

Another type of testing opportunity CMS will be offering in 2015 is end-to-end testing. The goal of this type of testing is to show that:

- Submitters are able to successfully submit claims containing ICD-10-CM codes to the Medicare FFS claims systems;
- CMS software changes made to support ICD-10 result in appropriately adjudicated claims (based on the pricing data used for testing purpose); and
- Accurate Remittance Advices (RAs) are produced.

Approximately 2,550 volunteer submitters will be selected nationwide to participate over three testing periods. Volunteers will represent a wide cross-section of provider types, claims types and submitter types. Information on volunteer registration will be provided when it becomes available.

The CMS website provides a wealth of information on transitioning to ICD-10-CM. In addition to the *MLN Matters*® memos that provide important information on ICD-10-CM, CMS has launched a website called *Road to 10*. It was developed with the small practice in mind, but the subject matter is still very applicable to larger practices. *Road to 10* includes an ICD-10 overview, physician perspectives, webcasts, FAQs, and more. http://www.roadto10.org/   Another source of up-to-date information on transitioning to ICD-10 is available from CMS at   http://www.cms.gov/Medicare/Coding/ICD10/CMS_ICD-10_Industry_Email_Updates.html   You can sign up for email updates from CMS via this address. Those updates will be of much help to you as you get ready for October 1, 2015.

Resouces:
https://www.federalregister.gov/articles/2014/08/04/2014-18347/change-to-the-compliance-date-for-the-international-classification-of-diseases-10th-revision