November 12, 2014

The Coalition for ICD-10, a broad constituency of organizations from across the health care spectrum, strongly supports the recently announced October 1, 2015 ICD-10 compliance date and opposes any steps to delay this implementation date.

ICD-10 implementation delays have been disruptive and costly for all of the coalition members, as well as to health care delivery innovation, payment reform, public health, and health care spending. As you know, significant investments were made by members of our coalition to prepare for the October 2014 implementation prior to enactment of the most recent delay. Many of us had to quickly reconfigure systems and processes that were prepared to use ICD-10 back to ICD-9. Newly trained coders who graduated from ICD-10 focused programs were unprepared to find jobs using the older code set.

HHS has estimated the cost of the most recent delay at $6.8 billion; further delays beyond October 1, 2015 range from $1 billion to $6.6 billion in additional costs. Nearly three quarters of the hospitals and health systems surveyed just before the current delay were confident in their ability to successfully implement ICD-10. Retraining personnel and reconfiguring systems multiple times in anticipation of the implementation of ICD-10 is unnecessarily driving up the cost of healthcare.

Coalition members are working together and with HHS to ensure a smooth and successful transition in 2015. We support the recently announced end-to-end testing dates issued by CMS and are encouraging all of our members to participate in these opportunities. In addition, members of our coalition are engaging in significant efforts to identify and educate those in need of assistance to be ready for the 2015 implementation, including payer-provider collaboratives, training and outreach initiatives, and programs to help coders maintain their new code set skills.

The Coalition for ICD-10 recently held an informative Congressional Briefing with a respected panel of experts from across the health care community to discuss the significant benefits to the health care system from adopting a more modern and effective code set and the need to transition to ICD-10 in October of 2015. Materials from this event can be found on our website at
http://coalitionforicd10.org/2014/09/16/capitol-hill-briefing/. Additionally, ICD-10 allows us to provide medical coding, population health management, tracking and surveillance of pandemic threats like Ebola which at this point does not have its own ICD-9 diagnosis code in the US.

We urge Congress to avoid any further delays of this needed coding update. We would be happy to meet with you or your staff to discuss this transition or respond to any questions or concerns.

Sincerely,

AdvaMed
Altegra Health
America’s Health Insurance Plans (AHIP)
American Health Information Management Association (AHIMA)
BlueCross BlueShield Association
College of Healthcare Information Management Executives (CHIME)
Healthcare Financial Management Association
Health IT Now
Inspira Health Network
Leidos Health (formerly SAIC)
Medical Device Manufacturers Association (MDMA)
Medtronic, Inc.
Professional Association of Health Care Office Management (PAHCOM)
3M
WellPoint