ICD-10-CM/PCS Delay: What Does It Mean To You?

The Protecting Access to Medicare Act of 2014 not only provided a one year patch for the Sustainable Growth Rate (SGR) formula, it also further delayed transition to ICD-10-CM/PCS. Per the legislation, “…the Secretary of Health and Human Services may not, prior to October 1, 2015, adopt ICD-10 code sets as the standard for codes sets under section 1173(c) of the Social Security Act (42 U.S.C. 1320d-2(c)) and section162.1002 of title 45, Code of Federal Regulations.”

Health care organizations are now facing the challenge of continuing and maintaining ICD-10-CM/PCS preparation within their organizations while still using ICD-9-CM until transition - which could be October 2015 or possibly later. This delay has shocked some stakeholders who have spent a significant amount of resources to meet an implementation deadline of October 2014. Others see this as a welcome opportunity that provides additional time to prepare.

The ASA Payment and Practice Management Department conducted a survey to determine ASA members’ viewpoints on how the delay would impact them. We prepared a brief questionnaire via Survey Monkey and sent a link to various ASA Committees and to the ASA members who follow us on LinkedIn. The survey ran from April 7-10, 2014 and garnered 27 responses.

When asked if the delay was a positive or negative, an equal number of respondents (37% each) indicated it was positive or that they were uncertain, 26% saw it as a negative event. Those who see the delay as a negative noted:

- We have already invested a lot of time and money into conversion and training. Don’t want to lose the momentum. Fear that we will now be skipping ICD 10 and going straight to ICD 11 or ICD 12 which will be even more costly.
- Our organization had good preliminary indication that ICD 10 would be useful for the system. This delay and uncertainty will cost time and money. We are implementing a new computer system which is another factor that has been compounded.
Those who see the delay as a positive commented:

- We are expecting big delays in billing with implementation of ICD 10. The longer it can be delayed, the better.
- More time for training and implementation. The move to a more accurate coding system will even the playing field for observed to expected mortality calculation and reduce system gaming. Most of the country simply cannot comply with the onerous task before October 1, 2014.

When asked about next steps, again, an equal number (38.5% each) reported that they would continue to prepare with no change in their timeline or continue to prepare but at a slower pace. 15.4% plan to stop work toward transition and 7.7% either did not know what their organization intended to do or that their organization had not yet decided next steps.

While ASA members and health care overall are divided on how they view this delay, it does create numerous questions and concerns for all. ASA will continue to update members with more information on the new implementation date and how to move forward once more information becomes available.

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Is the delay of the ICD-10-CM/PCS transition a positive or negative for your organization?

- Positive: 37%
- Negative: 37%
- Uncertain: 26%

What next steps are you considering?

- Continue to prepare as planned with no change in timeline: 38.50%
- Continue to prepare but at a slower pace: 38.50%
- Stop work on the issue: 15.40%
- Other: 7.70%