



Partnering for Electronic Delivery  
of Information in Healthcare

# WEDI ICD-10 NPRM PAG Agenda Day One

September 10, 2008

7:30 am- 5:00 pm – Registration Open

12:00 pm -1:00 pm – Plated Networking Luncheon

1:00 pm – 1:15 pm – Introduction to PAG Rules and Procedures –  
Moderator: Lisa Miller

*The session is a brief review of the WEDI Policy Advisory Group Rules and Procedures to be utilized during the subsequent sessions.*

1:15 pm –1:45 pm – Review of the NPRM –

Moderator: Jim Daley

*The session is a brief review of the NPRM to be reviewed during the subsequent sessions.*

1. Background Information
2. ICD -9 Limitations/ICD-10
3. SNOMED CT
4. Alternatives Considered
5. Provisions of Regulation
6. Impact Analysis
7. Costs/Benefits
8. Collect other issues from participants

*Note – this session is a high level review of the sections of the NPRM. No voting will occur in this session.*

## **1:45 pm – 3:15 pm - ICD 10 PAG Session 1**

**Moderator – Lisa Miller ,Timerkeeper – Michael Ubl**

**NPRM Section: I. Background**

**WEDI PAG Topics:**

**1. *Cross Walks***

- a. Are crosswalks viable?*
- b. Is this really a mapping exercise?*
- c. National guidance?*

**2. *Other code sets***

- a. Mapping*
  - i. SNOMED CT*
- b. Scope of use*

**3. *Implementation***

- a. Diagnosis*
- b. Procedure*

**4. *NCPDP***

- a. Special considerations not accounted for in NPRM*

**5. *Specific Stakeholder concerns***

- a. Payer*
- b. Provider*
- c. Vendor*
- d. Consumer*
- e. Other*

**6. *Voting and approval of comments***

**3:15pm – 3:30 pm - Break**

**3:30 pm – 4:00 pm - ICD 10 PAG Session 2**

**Moderator - Mark Williams, Timekeeper - Lisa Miller**

**NPRM Section(s): II. ICD-9-CM**

**III. Limitations of ICD-9- CM**

***NPRM Specific invitation to comment:***

*"49799 - We invite public comment on concerns with continued use of the ICD-9-CM code set."\*\**

**WEDI PAG Topics:**

1. ***Agreement with assumptions?***
  - a. *Insufficient codes and categories*
  - b. *Not enough detail for:*
    1. *Bio surveillance*
    2. *Pay-for-Performance/Value Based Purchasing/Competitive Purchasing*
    3. *Accurate Reporting( Bilateral, number of services, etc)*
  - c. *No longer supported by WHO*
  - d. *Desire for consistency with other countries*
2. ***Specific Stakeholder concerns***
  - a. *Payer*
  - b. *Provider*
  - c. *Vendor*
  - d. *Consumer*
  - e. *Other*
3. ***Voting and approval of comments***

**4:00 pm – 4:30 pm - ICD 10 PAG Session 3**

**Moderator – Jim Daley ,Timekeeper – Michael Ubl**

**NPRM Section: VII. Alternatives To Adopting ICD-10 -Code Sets:**

***NPRM Specific invitation to comment:***

*"49804 - In deciding to propose adoption of ICD-10-CM and ICD-10-PCS, we considered a number of alternatives. We invite public comment on the following discussion of those alternatives and our rationale:"\*\**

**WEDI PAG Topics:**

1. *Wait and use ICD-11*
  - a. *Soon to be implemented*
  - b. *Impact/differences between ICD-10 to ICD-11*
2. *Use unassigned codes - Do nothing*
3. *Use CPT-4 for inpatient procedures*
4. *Voting and approval of comments*

**4:30 pm – 5:30 pm - ICD 10 PAG Session 4**

**Moderator - Michael Ubl , Timekeeper – Jim Daley**

**NPRM Section: IV. ICD-10 and the Development of ICD-CM and PCS and**

**Subsection D. Statutory Requirements for Adoption of ICD-10-CM and ICD-10-PCS**

**WEDI PAG Topics:**

1. *Coding Issues*
  - a. *Outreach*
  - b. *Education*
  - c. *Training*
  - d. *Potential lack of resources*
  - e. *Use of specificity*
  - f. *Necessity of code selection software*
2. *Specific Stakeholder concerns*
  - g. *Payer*
  - h. *Provider*

- i. Vendor*
- j. Consumer*
- k. Other*

***3. Voting and approval of comments***

**5:30 pm – 6:00 pm - Review of Day one – comments**

**Moderator – Michael Ubl**

***Note: Day One Agenda may extend past 6pm.***

# WEDI ICD-10 NPRM PAG Agenda Day Two

September 11, 2008

7:30 am- 8:00 am-Continental Breakfast

7:30 am -3:00 am -Registration Open

8:00 am – 10:00 am - ICD 10 PAG Session 5

Moderator – Jim Daley, Timekeeper – Lisa Miller

NPRM Section: VIII. Provisions of the Proposed Regulation

*NPRM Specific invitation to comment:*

*"49819 - We invite public comment on our assumptions, as well as comments from affected government agencies" \**

*"49821- We solicit comments from industry and other stakeholders on other potential entities that may be affected by the transition from ICD-9 to ICD-10 code sets." \**

*"49822 - We recognize that many assumptions underlie our estimates of more accurate payments and we invite comments on this analysis." \**

*"49822 - For purposes of this impact analysis, we estimate that the benefit of fewer rejected claims would equal approximately \$1,015.41 million with a minimum range estimate of \$242 million and a maximum estimate of \$3,031 million. We invite the public to comment on our assumptions and to provide any data that will improve the accuracy of our analysis." \**

*"49823 - For purposes of this impact analysis, there may be a greater number of returned claims as well as an increase in the percentage of initial improper payments. In Table 13a, we show the expected effects of the initial impact of rejected and improper claims. We invite the public to comment on our assumptions and to provide any data that may improve the accuracy of our analysis." \**

*"49823 - For purposes of this impact analysis, we estimate that the benefit of a better understanding of new procedures with implementing ICD-10, would equal approximately \$812.54 million with a minimum range estimate of \$121 million and a maximum estimate of \$1,819 million. We invite the public to comment on our*

*assumptions and to provide any data that may improve the accuracy of our analysis."\**

*"49824 - For purposes of this analysis, we very conservatively claim a one percent benefit of our total disease management calculations based on RAND's formulas, and solicit feedback from the industry on this assumption."\**

*"49826 - CMS solicits industry and stakeholder comments on the direct and indirect impacts to current Health Information Technology initiatives."\**

*"49829 - In Table 13a, we show the expected effects of the initial impact of rejected and improper claims. We invite the public to comment on our assumptions and to provide any data that may improve the accuracy of our analysis."\**

*"49829 - Very small provider practices without practice management systems likely use only paper. In these instances, there will be minimal costs, such as revision to their paper records and the updating of their printed super bills. We invite industry and stakeholder comment regarding these assumptions."\**

*"49830 - Conclusion Based on the foregoing analysis, we could certify that this proposed regulation would not have a significant economic impact on a substantial number of small entities. However because of the substantial uncertainty in the data and our assumptions we invite public comments on the analysis and request any additional data that would help us determine more accurately the impact on the various categories of entities affected by the rule."\**

*"49830- Although the previous analysis indicates that the overall impact on the health care sector of the economy will be very small, we acknowledge that these entities may incur a significant economic impact. However, we believe these organizations comprise a small minority of the total number of health care entities. We solicit industry and stakeholder input on this issue."\**

*"49831 - Because of the considerable uncertainty in the data and our assumptions we invite public comments regarding whether this proposed regulation would have a significant economic impact on a substantial number of small entities. We request any additional data that would help us determine more accurately the impact on the various categories of entities affected by the rule."\**

## **WEDI PAG Topics:**

### **1. Timeline/Implementation Timeframe**

#### **a. Compliance Date**



*"49807 - We solicit public comment on the proposed compliance date of October 1, 2011."\**

*"49807 - We solicit industry and other stakeholder comments on our timeline assumptions and our proposed education and outreach strategy."\**

*"49808 - Regulatory impact the States are invited to comment on this section and all sections of this proposed rule"\**

*"49808 - We attempt to provide information for the impact analysis, focusing on savings projections and cost estimates. Tables 13 and 14 summarize cost benefit projections. We solicit comments on these data during the comment period for this proposed rule."\**

*"49814 -We solicit industry and other stakeholder comments on ICD-10 integration and use of workarounds."\**

*"49816 - We invite the public to comment on our assumptions and to provide any data that may improve the accuracy of our analysis."\**

*"49818 - We invite the public to comment on our assumptions and to provide any data that may improve the accuracy of our analysis."\**

#### **WEDI PAG Topics:**

- 1. Cost**
- 2. Benefit**
- 3. Cost versus Benefit**
  - a. Pilots*
  - b. Without awareness – are NPRM assumptions accurate?*
- 4. Other implementation factors**
  - a. Impact to Business processes*
    - i. Contracting*
    - ii. Benefit structures*
    - iii. Reporting*
    - iv. Other*
  - b. Impact to other industries*

- i. *Property and Casualty*
  - 1. *Workman's Comp*
- ii. *Public Health*
- iii. *School Systems*

**5. *Specific Stakeholder concerns***

- a. *Payer*
- b. *Provider*
- c. *Vendor*
- d. *Consumer*
- e. *Other*

**6. *Voting and approval of comments***

**11:30 am – 12:30 pm ICD 10 PAG Session 7**

**Moderator – Michael Ubl, Timekeeper – Mark Williams**

**Attendee/miscellaneous issues**

**12:30 pm to 1:30 pm Plated Networking Luncheon**

**1:30 pm – 3:00 pm ICD 10 PAG Session 8 Moderator –**

**Michael Ubl, Timekeeper Jim Daley**

**Summary/Review of comments collected /Next Steps ( if needed)**

*Voting and approval of any outstanding comments*

**3:00 pm - WEDI ICD-10 NPRM PAG adjourned**

*\* Denotes actual text from the ICD-10 NPRM 45 CFR Parts 160 and 162 HIPAA Administrative Simplification: Modifications to Medical Data Code Set Standards to Adopt ICD-10-CM and ICD-10-PCS; Proposed Rule published in the Federal Register on Friday August 22 2008.*