

Phase 1 Plan for ICD-10 Implementation

Time Frame: October 2011 through May 2012

The International Classification of Diseases, Tenth Revision (ICD-10) transition from ICD-9 will be a complex and enterprise-wide endeavor for the Indian Health Service (IHS). The IHS National ICD-10 Team has compiled a series of documents to highlight activities that support the implementation. The Phase documents (1 – 4) are meant to inform IHS facilities, Tribal, and Urban programs (I/T/U) of the high-level activities that occur in each phase. Each Area has assigned an Area ICD-10 Coordinator to work with facilities on detailed activities for the transition.

Area/Facility ICD-10 Coordination

Although the IHS National ICD-10 Team and the Area ICD-10 Coordinator will provide guidance on timelines, Resource and Patient Management System (RPMS) development, and implementation, it will be important to establish a local multi-disciplinary team to coordinate the change to ICD-10 in your facility.

- Create a multi-disciplinary team and appoint a facility point of contact to work with the IHS National ICD-10 Team and the Area ICD-10 Coordinator.
- Meet regularly and communicate often with stakeholders including senior leadership and the national team.
- Join the [IHS ICD-10 Listserv](#) and be familiar with the transition requirements from these and other resources:
 - Centers for Medicare and Medicaid Services (CMS): <http://www.cms.gov/ICD10/>
 - IHS ICD-10: <http://www.ihs.gov/icd10/>
 - American Health Information Management Association (AHIMA): <http://www.ahima.org/icd10/about.aspx>
 - Healthcare Information and Management Systems (HIMSS): http://www.himss.org/ASP/topics_icd10playbook.asp
 - American Academy of Professional Coders (AAPC): <http://www.aapc.com/ICD-10/>
 - American Hospital Association (AHA): <http://www.ahacentraloffice.com/ahacentraloffice/shtml/ICD10overview.shtml>
 - ICD-10 Coders Academy: http://www.icd10codersacademy.com/about_icd10.html

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ICD-10 Awareness

The IHS National ICD-10 Team has a number of tools for you to stay current on the latest activities with ICD-10 and to spread awareness within your facility.

- Web site – presentations, Awareness Webinar, other resources - <http://www.ihs.gov/icd10/>.
- Listserv – interactive e-mails to receive information and to share your questions - http://www.ihs.gov/listserver/index.cfm?module=signUpForm&list_id=201.
- Presentations – the national team presents regularly at many venues. The presentations are also available for you to present to your stakeholders.

Awareness is important for, but not limited to, the following:

- Health Information Management
- Accounting
- Auditing
- Clinical and other department Management
- Utilization Management
- Benefits Coordination
- Hospice Professionals
- Data Analysts/Statisticians
- Performance Improvement
- Senior Leadership
- Billing and/or Financial Office
- Compliance
- Clinicians
- Quality Management
- Patient Registration
- Visiting providers
- Data Security
- Researchers
- Information Technology
- Coding Professionals

Impact Assessment

The IHS National ICD-10 Team is determining the development necessary for RPMS and other impacts that are of a national scope; however, there may be individual reports, documentation, or work flows that are specific to your facility. In order to understand the impact to your facility, conduct an impact assessment:

- Assess the impact to internal and external reporting and statistical analysis.
- Analyze the changes to clinical and operational documentation.
- Identify impacts to every department and changes in workflow.
- Identify business associate, vendor and payer contracts for impacts.
- Assess business partner readiness for testing for the transition.
- Consider potential impacts to revenue stream.
- Review any Commercial-Off-The-Shelf (COTS) products that interface with RPMS and/or that use ICD-9 codes.

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Training Plan

The transition to ICD-10 requires training for coders and many other disciplines. Each facility will be responsible for obtaining the necessary training. The IHS National ICD-10 Team will provide information on sources of training and will collaborate with federal partners to organize training opportunities. In Phase 1, determine your plan for training.

Building on a foundation of ICD-10 awareness, three levels of ICD-10 training should be evaluated:

- **Code User** – performance improvement, quality management, case management, utilization review, researchers, epidemiologists, data managers, patient registration, ancillary staff, public health nursing.
- **Provider** – clinician, physician, family nurse practitioner, physician assistant, certified mid-wife, advance practice nurse.

Intensive Coding – coder, biller, document improvement specialist.

- 2011 – Foundational knowledge in biomedical sciences, medical terminology, and pharmacology.
- 2012 – Fundamental training on ICD-10 CM (outpatient and inpatient) and ICD-10 PCS (inpatient).
- Late 2012 through 2013 – Expertise in applying ICD-10 CM and ICD-10 PCS (not more than 6-9 months before the compliance date).

To build the training plan:

- Identify all the personnel who will require training and the needed level.
- Conduct an assessment of coding staff knowledge.
- Determine preliminary method of training for each level (see Table 1 for sources).
- Build training costs into annual budgets.
- Consider certification for coders.

In addition to ICD-10 training, changes to RPMS will necessitate some training to understand new workflows on the RPMS modules. As changes are made to RPMS, the IHS National ICD-10 Team will communicate any needed training.

RPMS

The changes required to RPMS to support the conversion to ICD-10 are extensive. It is likely that multiple patches will need to be installed throughout FY2012 and FY2013. It is critical that RPMS applications are up-to-date with all patches, including security requirements.

Sources: AHIMA Top 10 List, CDR Kelly Stewart (Phx AO), IHS ICD-10 Training Sub-group

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Sources for Training

The IHS ICD-10 National team has identified a few sources of training that are available for further evaluation. The national team does not endorse any of these agencies or vendors. Updates to sources for training will be made available on the IHS ICD-10 Website.

Table 1: Sources of Training

Resources	Costs	URL
World Health Organization (WHO)	No cost	http://apps.who.int/classifications/apps/icd/cid10training
American Health Information Management Association (AHIMA)	Member and non-member costs	http://www.ahima.org/continuing/default.aspx
Centers for Medicare and Medicaid Services (CMS)	No cost - awareness	http://www.cms.gov/icd10/05a_ProviderResources.asp#TopOfPage
Commission for Accreditation for Health Informatics and Information Management Education (CAHIIM) Programs	Varies by college	http://www.cahiim.org/aceredipgms.asp
AAPC	Member and non-member costs	http://www.aapc.com/ICD-10 ICD-9 to ICD-10 Code Translator – AAPC: http://www.aapc.com/ICD-10/codes/index.aspx
University of Minnesota Anatomy Self-Test	No cost	http://msjensen.cehd.umn.edu/webanatomy/self