

Phase 3 Plan for ICD-10 Implementation

Time Frame: January 2013 through October 2013

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.

ICD-10 Awareness and Communication

Continue efforts toward spreading ICD-10 awareness:

- Use the presentations available on the ICD-10 Website and pre-recorded Webinars.
- Encourage others to join the Listserv to be informed of ICD-10 related efforts.
- Maintain positive feedback and communicate often with the national team and stakeholders on the transition status.

Modifications from Impact Assessment

In the first two phases, impacts were determined and plans made. In this phase, modifications will need to be accomplished for the transition. Areas for modifications may include:

- Reporting and analysis.
- Business and clinical documentation, processes, and procedures.

Business Associate, Vendor, and Payer Readiness

By Phase 3, business associates, vendors, and payers should be finalizing for the transition, as is Indian Health Service:

- Continue regular communications with business associates, vendors, and payers for status updates.
- Alert the IHS National ICD-10 Team to any changes in the initial readiness timelines.

Training Plan Implementation

Awareness of ICD-10 should become a regular part of facility and Area communications. Reinforce the national deadlines and local milestones:

- Intensive training for coding staff, billers, and providers as outlined in the training plan.
- Complete role-based training as outlined in your training plan.
- Available application training should be attended to ensure that staff understand changes to software applications.

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Clinical Documentation Improvement Efforts

In the second phase, a detailed review of clinical documentation was conducted and improvement strategies implemented:

- Review progress of improvement efforts.

Resource and Patient Management System (RPMS)

Continue to ensure that RPMS applications are up-to-date with all patches, including security requirements:

- Pay attention to software changes either through new documentation and/or available training.
- Participate in system testing as needed.
- Work with the national team to ensure a smooth transition.

Revenue Cycle

The detailed analysis conducted in Phase 2 may provide insight into potential losses from productivity decreases, rejected claims, and more positively, improved clinical documentation:

- Continue to communicate with payers to understand transition timeline and any impacts to reimbursement from policy changes, reimbursement schedules, etc.
- Prepare department heads for any revenue impacts.

Risk Management

Risk management is an ongoing activity throughout this phase:

- Continue documenting risks and strategies to accept, transfer, avoid, mitigate, or manage risks.
- Escalate risks/issues that impact national efforts to the national team.
- Test the contingency plan to be prepared for the transition.

Retention and Recruitment

Phase 3 will test the planning and preparation that you've accomplished over the last two phases. The coders who will have to assimilate the intensive training and apply the new knowledge while trying to maintain revenues may be under stress:

- Pay attention to signs of stress in coders and others receiving intensive training.
- Make efforts to retain experienced coders and billers.
- Develop new or use existing means for recruiting experienced and ICD-10 trained coders.

Go-Live!

Watch for communication from the IHS National ICD-10 Team and the Area ICD-10 Coordinator on the IHS-wide transition.

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Sources: AHIMA Top 10 List and ICD-10 CMS/PCS Transition: Planning and Preparation Checklist, CDR Kelly Stewart (Phx AO), IHS ICD-10 Training sub-group