

ICD-10 Frequently Asked Questions (FAQ)

Planning

1. What is ICD-10?

ICD-10 is the International Classification of Diseases, 10th Revision. On January 16, 2009, HHS published a final rule on the International Classification of Diseases, 10th Revision, Clinical Modification/Procedure Coding System (ICD-10-CM/PCS), requiring all HIPAA-covered entities to adopt the ICD-10-CM/PCS (diagnosis/inpatient procedure codes) by October 1, 2013.

On September 5, 2012, the United States Department of Health and Human Services (HHS) finalized the one-year delay of the ICD-10-CM/PCS. The implementation timeline was finalized within the final rule for the Adoption of a Standard for a Unique Health Plan Identifier (HPID). The final rule required that all HIPAA-covered entities adopt the ICD-10 code set by October 1, 2014.

On April 1, 2014, the bill H.R. 4302, Protecting Access to Medicare Act of 2014 was signed into law. The law bars the Department of Health and Human Services (HHS) from adopting the ICD-10 code set as the standard before October 1, 2015, at the earliest. On May 1, 2014, the Centers for Medicare & Medicaid Services (CMS) announced that ICD-10 will be implemented on October 1, 2015. Based on this change, MassHealth has evaluated the impact of the delay on MassHealth and will continue to provide more information as it becomes available. In the meantime, MassHealth will continue to test ICD-10 transactions with its trading partners through September 2015.

2. How does the delay in ICD-10 Implementation affect providers?

The delay in the implementation provides additional time for providers, vendors, and payers to prepare for the transition to ICD-10. Providers should continue to develop their testing and training, and implementation plans, and should schedule a date to test ICD-10 transactions with MassHealth as soon as possible.

3. Why is the transition to ICD-10 happening?

The transition is occurring because the ICD-9 code sets collect limited data about patients' medical conditions and inpatient hospital procedures. The ICD-9 code set is 30 years old, has outdated and obsolete terms, and is inconsistent with current medical practice. Additionally, it has reached its capacity to support new codes and categories as required.

ICD-10 improvements over the previous code version include the following.

- Enabling greater clinical specificity to describe the severity or complexity of various disease conditions.
- Enhancing the ability to exchange meaningful healthcare data with healthcare organizations and professionals around the world since many countries are already using ICD-10 or a clinical modification of it.
- Providing a more effective means of monitoring utilization of resources, measuring performance, and analyzing healthcare costs and outcomes.

4. Do all MassHealth providers need to transition to ICD-10?

Yes. All MassHealth providers who submit transactions that contain ICD codes to MassHealth must comply with ICD-10. All claims submitted with dates of service or dates of discharge on or after the implementation date must include ICD-10 codes.

5. What should providers do to prepare for the transition to ICD-10?

Providers should

- assess the impact of ICD-10 on their organization;
- determine which specific ICD-10 codes their organization will use for impacted business processes and systems;
- remediate their systems as applicable;
- confer with vendors (if applicable) to confirm their implementation schedule (that is, when they will be ready to test and support ICD-10 transactions, deliver software, and so on);
- develop implementation plans;
- develop contingency plans; and
- develop and implement plans to train physicians and staff as applicable.

6. Does the Centers for Medicare & Medicaid Services (CMS) have any helpful hints for moving toward ICD-10 compliance?

Yes. Please refer to www.cms.gov/ICD10 for the latest guidance from CMS on ICD-10 compliance.

7. What should software vendors, clearinghouses, and third-party billing services be doing now to make sure that they are ready to support organizations with their transition to ICD-10?

Software vendors, clearinghouses, and third-party billing services should upgrade their software, systems, and interfaces to support the ICD-10 code set. They should also communicate their implementation schedules, software delivery schedules, and testing plans to clients. CMS has resources to help vendors and their customers prepare for a smooth transition to ICD-10. Visit www.cms.gov/ICD10 to find out more.

8. What will happen if I do not transition to ICD-10 by the implementation date?

MassHealth will not be able to process your claims for dates of service or dates of discharge on or after the ICD-10 implementation date without ICD-10 codes. However, claims submitted to MassHealth for dates of service or dates of discharge before the implementation date will be processed using ICD-9 codes. This includes resubmittals, adjustments, and voids.

9. Will CMS impose penalties on my organization if I do not comply?

All HIPAA-covered entities must comply with the ICD-10 federal mandate. CMS standard HIPAA compliance enforcement and penalties will apply. Initially, covered entities could be fined up to \$25,000 per violation of each standard. However, CMS has increased that penalty to a maximum of \$1.5 million per violation. Please visit www.cms.gov for more information about all HIPAA penalties.

10. Will new MassHealth trading-partner agreements be required?

No. MassHealth providers will not be required to sign a new Trading Partner Agreement.

11. Where can I find information on the ICD-10 code set?

You can find information, at no charge, on the CMS website at www.cms.gov/ICD10. The web site includes important information on the following.

- ICD-10 CM (diagnosis) and ICD-10 PCS (procedure)
- General equivalence mappings (GEMs)
- Reimbursement mappings
- Payer and provider timelines and transition checklists; and
- ICD-10 legislation

12. Will there be changes to the CMS-1500 and UB-04 paper claim forms?

Yes. The National Uniform Billing Committee (NUBC) has changed the UB-04 paper claim form to accommodate the use of ICD-10 codes. You can find information at www.nubc.org. The National Uniform Claim Committee (NUCC) has updated the CMS-1500. You can find information at www.nucc.org. The updated MassHealth billing instructions for the CMS-1500 and UB-04 can be found on the MassHealth ICD-10 Implementation web page at www.mass.gov/eohhs/gov/newsroom/masshealth/providers/icd10-implementation.html.

13. What other changes will take place at MassHealth that will affect providers?

MassHealth has developed an ICD-10 Key Concepts document that provides a high-level outline of the major changes that MassHealth providers should be aware of. This document addresses only some of the changes taking place, so providers should continue to monitor MassHealth communications throughout the implementation. The Key Concepts document will be updated as MassHealth completes external testing. The document can be found at [Placeholder for link to Key Concepts document].

14. Can I use ICD-9 and ICD-10 codes on the same claim?

No. CMS has stated that ICD-9 and ICD-10 codes cannot be submitted on the same paper or electronic claim. Please see MLN Matters #MM7492 - Medicare Fee for Service Claims Processing Guidelines at www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM7492.pdf. After the transition to ICD-10, claims submitted to MassHealth with codes of the wrong ICD version will be denied.

15. Will CMS issue any additional ICD9 or ICD-10 codes before October 1, 2015?

Yes, CMS may issue a limited number of ICD-9 and ICD-10 codes while organizations are preparing for the implementation, and has issued a partial ICD code freeze. The details of this code freeze can be found at https://www.cms.gov/Medicare/Coding/ICD10/downloads/Partial_Code_Freeze.pdf. Visit the CMS ICD-10 web page at www.cms.gov/Medicare/Coding/ICD10/index.html for information about the latest version of the code sets.

Testing**16. Will I be able to test with MassHealth before the implementation date?**

Yes. MassHealth completed its beta testing with trading partners in April 2014 and began conducting Trading Partner Testing (TPT) with vendors in July 2014. Testing with all other trading partners will begin in September 2014, and continue through September 2015. If you are ready to test now or anticipate that you will be ready to test with MassHealth at any time before the implementation, please contact the MassHealth EDI testing team toll-free at 855-295-4047 or edi@mahealth.net to arrange a test date.

17. What should providers do to prepare for testing?

Providers should

- ensure their systems are remediated and determine when they will be ready to test with MassHealth;
- contact their software vendors, clearinghouses, and other vendors to discuss ICD-10 implementation plans and confirm when their software will be available (if applicable), and/or when they will be ready to test transactions on behalf of providers; and
- check the MassHealth ICD-10 Implementation web page at www.mass.gov/eohhs/gov/newsroom/masshealth/providers/icd10-implementation.html for updated documentation and other information.

18. Will MassHealth provide test plans, scenarios, and scripts?

No, MassHealth will not provide detailed testing scenarios and scripts. However, MassHealth will provide general guidelines about the number and types of claims to submit for testing, and key parameters and requirements for testing with the agency. For more information about testing, please contact the MassHealth EDI testing team at 855-295-4047 (toll free) or edi@mahealth.net.

19. What ICD-10 documentation will be made available to providers for testing?

MassHealth will make the following documentation impacted by ICD-10 available to providers.

- Billing instructions
- Companion guide changes (as applicable)
- Forms
- Other manuals

Drafts of ICD-10 documentation will be available as updates are completed. You can access this documentation on the MassHealth ICD-10 Implementation web page at www.mass.gov/eohhs/gov/newsroom/masshealth/providers/icd10-implementation.html. Please check this page frequently for the latest documentation.

Training**20. Will MassHealth provide ICD-10 training for providers?**

Yes. MassHealth will provide standard training to providers that outlines the changes to MassHealth policy and procedures (such as billing changes or testing conditions) to ensure that providers have the information they need to successfully submit transactions to MassHealth when ICD-10 has been adopted.

21. When will MassHealth provide training?

MassHealth is working to define its training plan. Based on the implementation delay, training is expected to begin in the summer of 2015. Information about the training schedule will be made available to providers in the spring of 2015.

Implementation**22. What is MassHealth's ICD-10 implementation plan?**

MassHealth intends to implement the ICD-10 code set by the compliance date. MassHealth will continue to test with its trading partners from September 2014 to September 2015. Any providers that intend to test with MassHealth are encouraged to set a testing date as soon as possible. MassHealth will notify providers of its cut-over plans in the summer of 2015. In the meantime, MassHealth will communicate implementation plans and specific changes to its billing and policies to providers through standard MassHealth communication channels such as provider bulletins, meetings, banner messages, and Provider Online Service Center (POSC) messages.