Implementing ICD-10 in your practice

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The government has set a final compliance date of Oct. 1, 2014, for industry adoption of ICD-10. As you attempt to successfully implement the new code set, consider these steps.

Create an implementation team

ICD-10 will impact many areas of your practice, and your team should represent each of them. The size and complexity of your organization will influence which staff members you choose (and how many) for the internal implementation team, but at a minimum, it should include members from the clinical and administrative areas of the practice.

It is preferable to ask a physician with budgetary authority to serve as a “champion” who communicates critical information to other clinicians. Peer-to-peer interaction can be particularly effective when communicating with clinicians. Other members of the medical staff (including nursing staff and nonphysician providers) should be included along with staff from the coding, billing and information systems departments. Larger institutions will want to ensure that staff members from benchmarking and research, clinical trials and other departments that use diagnosis-based data are on this team, too.

It is helpful to identify an appropriate governance structure for the team and communicate roles and responsibilities for executive sponsors, steering committees and smaller groups with specific implementation responsibilities. Staff members are busy with other duties and projects, so consider dividing tasks and assigning them to subteams to avoid overburdening team members. Roles should be well-defined with clear accountability and the authority to make and act on decisions.

Develop backup plans for each implementation and testing milestone to avert potential problems; establish completion dates and monitor progress. For example, what will your practice do if a critical vendor does not produce an upgrade by the expected date? Outline a protocol for identifying implementation issues and correcting them. Each team and subteam should also identify available internal and external tools and resources as well as additional tools and resources that will need to be purchased.

Build internal awareness

The initial staff communications about ICD-10 will most likely focus on what the change is, when it will happen and how it will impact the organization. It is wise to include all staff members in these communications, even those who are not directly impacted by the code set. Explaining the potential consequences of inaction, such as an increase in denied claims leading to a significant disruption to cash flow, will be especially important when communicating to senior management. As you create a communication plan, it might be effective to review lessons learned from any previous all-staff efforts, such as efforts to comply with HIPAA privacy regulations, the adoption of an EHR or even moving to a new location.

Select the most appropriate communication method for your practice, which might be a written report posted in common areas, regular oral reports during staff meetings, visual presentations using PowerPoint, timely emails or a combination of approaches. Larger organizations and those with multiple locations might consider hosting webinars to ensure that a consistent message is conveyed to all staff. You might also need to develop different communication vehicles for specific staff and departments. Again, peer-to-peer communication can be an effective approach to conveying key messages to clinical staff, such as budget requirements and the need for revised clinical documentation to accommodate ICD-10 codes. In general, communication to staff should include an explanation of the purpose.
and expected outcomes of the transition and could take the following approach:

• Provide ICD-10 background information and implementation timeline.
• Raise implementation issues and concerns, and remind staff of the potential consequences of inaction.
• Introduce teams and subteams.
• Identify staff members who are responsible for answering questions about ICD-10 implementation for each department or organization.

Create an external network

Migrating to ICD-10 could prove challenging enough to warrant the assistance of external colleagues to ensure a smooth transition. Networking with peers in similar-size practices or those in the same specialty will provide a valuable opportunity to:

• Share team-building and internal communication strategies
• Discuss implementation successes and failures
• Coordinate communications with external trading partners, such as practice management system and EHR vendors, clearinghouses, billing and coding companies and health plans
• Compare external trading partner responses and concerns
• Discuss implementation updates and changes required in systems and business processes
• Pursue collaborative opportunities for ICD-10 training

MGMA-ACMPE members can leverage the Member Community to share strategies, ask questions and learn from the ICD-10 implementation experiences of their colleagues. Visit mgma.com/code-community to get started.

Resources:

Access MGMA ICD-10 resources at mgma.com/code-note-ICD10.

CMS ICD-10 resources are available at cms.gov/Medicare/Coding/ICD10.