



Healthcare Consulting

**ICD-10-CM PREPAREDNESS:
KEY PLANNING POINTS**

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KEY POINTS FOR CONSIDERATION

The ICD-10 Transition is one of the biggest changes to affect the healthcare industry in over 20 years. Not only will coders, billers, and practice manager require ICD-10-CM diagnosis code and documentation training, but clinicians and physicians must also be educated to understand their role in the transition/implementation and to comply with the new and more specific documentation requirements.

- ICD-10-CM diagnosis codes will be used by all providers in every healthcare setting.
- ICD-10-PCS procedure codes will only be used for hospital claims for inpatient hospital procedures.
- The switch to ICD-10-PCS will not impact CPT or HCPCS codes, so providers who report those codes now for physician claims will continue to do so.

CLINICAL EXAMPLES

Along with encounter forms and super bills, physician charting and documentation practices will also be impacted by the implementation of ICD-10-CM. See examples below:

- **Documentation of common condition: i.e. Strep throat**

1 code used in ICD-9-CM, 3 codes used in ICD-10-CM

- ICD-9 diagnosis 034.0
- ICD-10 diagnoses (translation options):
 - J02.0 Streptococcal pharyngitis
 - J03.00 Acute streptococcal tonsillitis, unspecified
 - J03.01 Acute recurrent streptococcal tonsillitis

- **Documentation of social history condition: i.e. Tobacco abuse**

1 code used in ICD-9-CM, 8 codes used in ICD-10-CM

- ICD-9 diagnosis 305.1
- ICD-10 diagnoses (translation options):
 - F17.200 Nicotine dependence, unspecified, uncomplicated
 - F17.201 Nicotine dependence, unspecified, in remission
 - F17.210 Nicotine dependence, cigarettes, uncomplicated
 - F17.211 Nicotine dependence, cigarettes, in remission
 - F17.220 Nicotine dependence, chewing tobacco, uncomplicated
 - F17.221 Nicotine dependence, chewing tobacco, in remission
 - F17.290 Nicotine dependence, other tobacco product, uncomplicated
 - F17.291 Nicotine dependence, other tobacco product, in remission



OPERATIONAL KEY POINTS

- Encounter forms will need to be updated to accommodate the new diagnosis codes from the current 3 to 5 digit ICD-9 diagnosis code to the 3-7 digit ICD-10 diagnosis code.
- With the implementation of the ICD-10-CM code format, super bills may not be practical.
 - In a recent study conducted by the American Academy of Professional Coders (AAPC), the American Academy of Family Medicine's super bill went from two pages under ICD-9-CM to six pages under ICD-10-CM.
 - Physician practices that are unable to switch to electronic medical records that will support the new code format will likely have to revise and develop new super bills.

CODING / DOCUMENTATION KEY POINTS

- Coders, billers, and physicians will need to communicate more to obtain documentation clarification in order to arrive at the granular specificity required in ICD-10-CM.
 - Documentation in the physician office medical record should provide adequate information regarding a patient's illness and treatment to ensure that claims are coded and billed appropriately.
 - Greater specificity in coding and billing will lead to better reporting of quality measures and enhance reimbursement.

REVENUE CYCLE KEY POINTS

- Payer readiness to accept claims in 5010
- Payers face large conversion costs
- Days in AR rise
- Bill Hold and DNFB increase
- Denials increase with increased rebills and rework of claims
- Delayed reimbursement
- Dual coding



SUGGESTED SPECIFIC ACTION STEPS

• IDENTIFY

- By physician report of currently used ICD-9 codes in descending order of use by visit count volume
- Across physician specialty (i.e. Internal Medicine) accumulate current listing of top 25 – 30 ICD-9 codes used
- Cross reference by physician to the current ICD-9 codes on the superbill
- Determine paper processing capability to prepare for potential 5010 payer delays
- Determine Denial Tracking tools- establish the baseline and monitor for DNFB, Days in A/R, and aging Accounts
- Evaluate staffing models for Billing, Follow-Up and Denial account resolution
- Assess AR Reserves and modify as needed- an increase of 1 AR Day =?, and increase of 10=?
- Determine staffing needs to prepare for increased work load related to dual coding and training to minimize DNFB

• ISOLATE

- Pull sample medical records across physician specialty for each of the top 25 – 30 ICD-9 codes used
- Code these records using ICD-10 codes and accumulate top 25 – 30 ICD-10 codes from this scenario testing

• ALTERNATIVES

- Revise superbill by specialty to these top ICD-10 codes based on specialty – creating multiple versions of superbill – possibly by physician and/or by specialty
- Migrate to electronic superbill/encounter form (through McKesson)
- Patient-specific electronic superbill/encounter form option based on prior ICD-10 history as well as documented problem for the current visit (possibly through McKesson or third party vendors)

• TRAINING

- Involve physician/care team staff in scenario-based training of their own top 10 ICD-10 codes using current patient charts

• IT SUPPORT – EDITS

- Request edits/likely coding lists by physician in the McKesson software billing process to insure that correct codes are being used



- Outliers list to be reviewed by billing/coding staff with email feedback/input from physician care team staff
- **FEEDBACK LOOP**
 - Regular and detailed feedback on outlier ICD-10 coding to be provided to physician/ care team staff
 - Denial management feedback, particularly positive feedback, based on denial percentage targets by physician team for coding with ICD-10

ICD-10 PREPARATION QUESTIONS

1. For what business processes will we convert ICD data and when?
2. What are our data partners (e.g., contractors, vendors, and business partners) doing and when?
3. What do we do with performance measures used for contract management and public reporting?
4. How are we going to monitor the ICD-10 transition (e.g., access, quality, budget)?
5. How do you plan to engage providers related to the ICD-10 transition?
6. How do you propose to monitor coding and documentation quality?
7. What are your thoughts on how to address coding and documentation quality issues?
8. How do you plan to leverage ICD-10 related to program integrity?
9. What lessons learned can we share from previous large scale projects (e.g. EMR, 5010)?
10. How are we planning to manage uncertainty in financial reporting, contract compliance and quality measurement during ICD-10 transition?

**APPENDIX A:
FACILITY ENCOUNTER FORM EXAMPLE
SAMPLE ICD-9 TO ICD-10 DIAGNOSIS IMPACT ANALYSIS**

**Appendix A:
Facility Encounter Form Example
Sample ICD-9 to ICD-10 Diagnosis Impact Analysis**

Current Superbill Code		ICD-9 to ICD-10 Translation Options	
ICD-9-CM	ICD-9-CM Description	ICD-10-CM	ICD-10-CM Description
49300	Extrinsic asthma, unspecified	J4520	Mild intermittent asthma, uncomplicated
		J4530	Mild persistent asthma, uncomplicated
		J4540	Moderate persistent asthma, uncomplicated
		J4550	Severe persistent asthma, uncomplicated
49301	Extrinsic asthma with status asthmaticus	J4522	Mild intermittent asthma with status asthmaticus
		J4532	Mild persistent asthma with status asthmaticus
		J4542	Moderate persistent asthma with status asthmaticus
49302	Extrinsic asthma with (acute) exacerbation	J4552	Severe persistent asthma with status asthmaticus
		J4521	Mild intermittent asthma with (acute) exacerbation
		J4531	Mild persistent asthma with (acute) exacerbation
		J4541	Moderate persistent asthma with (acute) exacerbation
78900	Abdominal pain, unspecified site	J4551	Severe persistent asthma with (acute) exacerbation
		R100	Acute abdomen
		R109	Unspecified abdominal pain
78901	Abdominal pain, right upper quadrant	R1011	Right upper quadrant pain
78902	Abdominal pain, left upper quadrant	R1012	Left upper quadrant pain
78903	Abdominal pain, right lower quadrant	R1031	Right lower quadrant pain
78904	Abdominal pain, left lower quadrant	R1032	Left lower quadrant pain
78905	Abdominal pain, periumbilic	R1033	Periumbilical pain
78906	Abdominal pain, epigastric	R1013	Epigastric pain
78907	Abdominal pain, generalized	R1084	Generalized abdominal pain
78909	Abdominal pain, other specified site	R1010	Upper abdominal pain, unspecified
		R102	Pelvic and perineal pain
		R1030	Lower abdominal pain, unspecified
25000	Diabetes mellitus without mention of complication, type II or unspecified type, not stated as uncontrolled	E119	Type 2 diabetes mellitus without complications
		E139	Other specified diabetes mellitus without complications
25001	Diabetes mellitus without mention of complication, type I [juvenile type], not stated as uncontrolled	E109	Type 1 diabetes mellitus without complications
25002	Diabetes mellitus without mention of complication, type II or unspecified type, uncontrolled	E1165	Type 2 diabetes mellitus with hyperglycemia
25010	Diabetes with ketoacidosis, type II or unspecified type, not stated as uncontrolled	E1310	Other specified diabetes mellitus with ketoacidosis without coma
25011	Diabetes with ketoacidosis, type I [juvenile type], not stated as uncontrolled	E1010	Type 1 diabetes mellitus with ketoacidosis without coma
25020	Diabetes with hyperosmolarity, type II or unspecified type, not stated as uncontrolled	E1100	Type 2 diabetes mellitus with hyperosmolarity without nonketotic hyperglycemic-hyperosmolar coma (NKHHC)
		E1101	Type 2 diabetes mellitus with hyperosmolarity with coma
		E1300	Other specified diabetes mellitus with hyperosmolarity without nonketotic hyperglycemic-hyperosmolar coma (NKHHC)
		E1301	Other specified diabetes mellitus with hyperosmolarity with coma
25030	Diabetes with other coma, type II or unspecified type, not stated as uncontrolled	E11641	Type 2 diabetes mellitus with hypoglycemia with coma
		E1311	Other specified diabetes mellitus with ketoacidosis with coma
		E13641	Other specified diabetes mellitus with hypoglycemia with coma
25031	Diabetes with other coma, type I [juvenile type], not stated as uncontrolled	E1011	Type 1 diabetes mellitus with ketoacidosis with coma
		E10641	Type 1 diabetes mellitus with hypoglycemia with coma
25040	Diabetes with renal manifestations, type II or unspecified type, not stated as uncontrolled	E1121	Type 2 diabetes mellitus with diabetic nephropathy
		E1122	Type 2 diabetes mellitus with diabetic chronic kidney disease
		E1129	Type 2 diabetes mellitus with other diabetic kidney complication
		E1321	Other specified diabetes mellitus with diabetic nephropathy
		E1322	Other specified diabetes mellitus with diabetic chronic kidney disease
		E1329	Other specified diabetes mellitus with other diabetic kidney complication

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ICD-9-CM	ICD-9-CM Description	ICD-10-CM	ICD-10-CM Description
25041	Diabetes with renal manifestations, type I [juvenile type], not stated as uncontrolled	E1021	Type 1 diabetes mellitus with diabetic nephropathy
		E1022	Type 1 diabetes mellitus with diabetic chronic kidney disease
		E1029	Type 1 diabetes mellitus with other diabetic kidney complication
25050	Diabetes with ophthalmic manifestations, type II or unspecified type, not stated as uncontrolled	E11311	Type 2 diabetes mellitus with unspecified diabetic retinopathy with macular edema
		E11319	Type 2 diabetes mellitus with unspecified diabetic retinopathy without macular edema
		E11321	Type 2 diabetes mellitus with mild nonproliferative diabetic retinopathy with macular edema
		E11329	Type 2 diabetes mellitus with mild nonproliferative diabetic retinopathy without macular edema
		E11331	Type 2 diabetes mellitus with moderate nonproliferative diabetic retinopathy with macular edema
		E11339	Type 2 diabetes mellitus with moderate nonproliferative diabetic retinopathy without macular edema
		E11341	Type 2 diabetes mellitus with severe nonproliferative diabetic retinopathy with macular edema
		E11349	Type 2 diabetes mellitus with severe nonproliferative diabetic retinopathy without macular edema
		E11351	Type 2 diabetes mellitus with proliferative diabetic retinopathy with macular edema
		E11359	Type 2 diabetes mellitus with proliferative diabetic retinopathy without macular edema
		E1136	Type 2 diabetes mellitus with diabetic cataract
		E1139	Type 2 diabetes mellitus with other diabetic ophthalmic complication
		E13311	Other specified diabetes mellitus with unspecified diabetic retinopathy with macular edema
		E13319	Other specified diabetes mellitus with unspecified diabetic retinopathy without macular edema
		E13321	Other specified diabetes mellitus with mild nonproliferative diabetic retinopathy with macular edema
		E13329	Other specified diabetes mellitus with mild nonproliferative diabetic retinopathy without macular edema
		E13331	Other specified diabetes mellitus with moderate nonproliferative diabetic retinopathy with macular edema
		E13339	Other specified diabetes mellitus with moderate nonproliferative diabetic retinopathy without macular edema
		E13341	Other specified diabetes mellitus with severe nonproliferative diabetic retinopathy with macular edema
		E13349	Other specified diabetes mellitus with severe nonproliferative diabetic retinopathy without macular edema
		E13351	Other specified diabetes mellitus with proliferative diabetic retinopathy with macular edema
		E13359	Other specified diabetes mellitus with proliferative diabetic retinopathy without macular edema
		E1336	Other specified diabetes mellitus with diabetic cataract
E1339	Other specified diabetes mellitus with other diabetic ophthalmic complication		

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Current Superbill Code		ICD-9 to ICD-10 Translation Options			
ICD-9-CM	ICD-9-CM Description	ICD-10-CM	ICD-10-CM Description		
25051	Diabetes with ophthalmic manifestations, type I [juvenile type], not stated as uncontrolled	E10311	Type 1 diabetes mellitus with unspecified diabetic retinopathy with macular edema		
		E10319	Type 1 diabetes mellitus with unspecified diabetic retinopathy without macular edema		
		E10321	Type 1 diabetes mellitus with mild nonproliferative diabetic retinopathy with macular edema		
		E10329	Type 1 diabetes mellitus with mild nonproliferative diabetic retinopathy without macular edema		
		E10331	Type 1 diabetes mellitus with moderate nonproliferative diabetic retinopathy with macular edema		
		E10339	Type 1 diabetes mellitus with moderate nonproliferative diabetic retinopathy without macular edema		
		E10341	Type 1 diabetes mellitus with severe nonproliferative diabetic retinopathy with macular edema		
		E10349	Type 1 diabetes mellitus with severe nonproliferative diabetic retinopathy without macular edema		
		E10351	Type 1 diabetes mellitus with proliferative diabetic retinopathy with macular edema		
		E10359	Type 1 diabetes mellitus with proliferative diabetic retinopathy without macular edema		
		E1036	Type 1 diabetes mellitus with diabetic cataract		
		E1039	Type 1 diabetes mellitus with other diabetic ophthalmic complication		
		25060	Diabetes with neurological manifestations, type II or unspecified type, not stated as uncontrolled	E1140	Type 2 diabetes mellitus with diabetic neuropathy, unspecified
				E1140	Type 2 diabetes mellitus with diabetic neuropathy, unspecified
E1141	Type 2 diabetes mellitus with diabetic mononeuropathy				
E1142	Type 2 diabetes mellitus with diabetic polyneuropathy				
E1143	Type 2 diabetes mellitus with diabetic autonomic (poly)neuropathy				
E1144	Type 2 diabetes mellitus with diabetic amyotrophy				
E1149	Type 2 diabetes mellitus with other diabetic neurological complication				
E1149	Type 2 diabetes mellitus with other diabetic neurological complication				
E11610	Type 2 diabetes mellitus with diabetic neuropathic arthropathy				
E1340	Other specified diabetes mellitus with diabetic neuropathy, unspecified				
E1340	Other specified diabetes mellitus with diabetic neuropathy, unspecified				
E1341	Other specified diabetes mellitus with diabetic mononeuropathy				
E1342	Other specified diabetes mellitus with diabetic polyneuropathy				
E1343	Other specified diabetes mellitus with diabetic autonomic (poly)neuropathy				
E1344	Other specified diabetes mellitus with diabetic amyotrophy				
E1349	Other specified diabetes mellitus with other diabetic neurological complication				
E1349	Other specified diabetes mellitus with other diabetic neurological complication				
E13610	Other specified diabetes mellitus with diabetic neuropathic arthropathy				

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ICD-9-CM	ICD-9-CM Description	ICD-10-CM	ICD-10-CM Description
25061	Diabetes with neurological manifestations, type I [juvenile type], not stated as uncontrolled	E1040	Type 1 diabetes mellitus with diabetic neuropathy, unspecified
		E1040	Type 1 diabetes mellitus with diabetic neuropathy, unspecified
		E1041	Type 1 diabetes mellitus with diabetic mononeuropathy
		E1042	Type 1 diabetes mellitus with diabetic polyneuropathy
		E1043	Type 1 diabetes mellitus with diabetic autonomic (poly)neuropathy
		E1044	Type 1 diabetes mellitus with diabetic amyotrophy
		E1049	Type 1 diabetes mellitus with other diabetic neurological complication
		E1049	Type 1 diabetes mellitus with other diabetic neurological complication
		E10610	Type 1 diabetes mellitus with diabetic neuropathic arthropathy
25070	Diabetes with peripheral circulatory disorders, type II or unspecified type, not stated as uncontrolled	E1151	Type 2 diabetes mellitus with diabetic peripheral angiopathy without gangrene
		E1152	Type 2 diabetes mellitus with diabetic peripheral angiopathy with gangrene
		E1159	Type 2 diabetes mellitus with other circulatory complications
		E1351	Other specified diabetes mellitus with diabetic peripheral angiopathy without gangrene
		E1352	Other specified diabetes mellitus with diabetic peripheral angiopathy with gangrene
		E1359	Other specified diabetes mellitus with other circulatory complications
25071	Diabetes with peripheral circulatory disorders, type I [juvenile type], not stated as uncontrolled	E1051	Type 1 diabetes mellitus with diabetic peripheral angiopathy without gangrene
		E1052	Type 1 diabetes mellitus with diabetic peripheral angiopathy with gangrene
		E1059	Type 1 diabetes mellitus with other circulatory complications
25080	Diabetes with other specified manifestations, type II or unspecified type, not stated as uncontrolled	E11618	Type 2 diabetes mellitus with other diabetic arthropathy
		E11620	Type 2 diabetes mellitus with diabetic dermatitis
		E11621	Type 2 diabetes mellitus with foot ulcer
		E11622	Type 2 diabetes mellitus with other skin ulcer
		E11628	Type 2 diabetes mellitus with other skin complications
		E11630	Type 2 diabetes mellitus with periodontal disease
		E11638	Type 2 diabetes mellitus with other oral complications
		E11649	Type 2 diabetes mellitus with hypoglycemia without coma
		E1165	Type 2 diabetes mellitus with hyperglycemia
		E1169	Type 2 diabetes mellitus with other specified complication
		E13618	Other specified diabetes mellitus with other diabetic arthropathy
		E13620	Other specified diabetes mellitus with diabetic dermatitis
		E13621	Other specified diabetes mellitus with foot ulcer
		E13622	Other specified diabetes mellitus with other skin ulcer
		E13628	Other specified diabetes mellitus with other skin complications
		E13630	Other specified diabetes mellitus with periodontal disease
		E13638	Other specified diabetes mellitus with other oral complications
		E13649	Other specified diabetes mellitus with hypoglycemia without coma
		E1365	Other specified diabetes mellitus with hyperglycemia
		E1369	Other specified diabetes mellitus with other specified complication

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Current Superbill Code		ICD-9 to ICD-10 Translation Options	
ICD-9-CM	ICD-9-CM Description	ICD-10-CM	ICD-10-CM Description
25081	Diabetes with other specified manifestations, type I [juvenile type], not stated as uncontrolled	E10618	Type 1 diabetes mellitus with other diabetic arthropathy
		E10620	Type 1 diabetes mellitus with diabetic dermatitis
		E10621	Type 1 diabetes mellitus with foot ulcer
		E10622	Type 1 diabetes mellitus with other skin ulcer
		E10628	Type 1 diabetes mellitus with other skin complications
		E10630	Type 1 diabetes mellitus with periodontal disease
		E10638	Type 1 diabetes mellitus with other oral complications
		E10649	Type 1 diabetes mellitus with hypoglycemia without coma
		E1065	Type 1 diabetes mellitus with hyperglycemia
		E1069	Type 1 diabetes mellitus with other specified complication
25090	Diabetes with unspecified complication, type II or unspecified type, not stated as uncontrolled	E118	Type 2 diabetes mellitus with unspecified complications
		E138	Other specified diabetes mellitus with unspecified complications
25091	Diabetes with unspecified complication, type I [juvenile type], not stated as uncontrolled	E108	Type 1 diabetes mellitus with unspecified complications