



Partnering for Electronic Delivery
of Information in Healthcare

July 30, 2015

The Honorable Sylvia Mathews Burwell
Secretary
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

RE: Recommendations to Enhance the Transition to ICD-10

Dear Secretary Burwell:

In its advisory role under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Workgroup for Electronic Data Interchange (WEDI) periodically brings to the attention of the Department of Health and Human Services issues related to Administrative Simplification and related areas that it believes merit review and consideration.

Following the recent ICD-10 Survey results submitted to HHS, the WEDI Board of Directors offers the following recommendations to help ensure a smoother industry transition to ICD-10:

Recommendations:

- Currently, there is no publicly available information regarding the readiness level of each Medicaid agency. WEDI recommends that HHS expeditiously publish a consolidated public source of information containing the existing state of Medicaid readiness to assist providers and clearinghouses during the claim submission process. At a minimum, this could be a collection of website links to each agencies' readiness level.
- The recently-announced Ombudsman position should be appointed as soon as possible and strongly urges CMS to not wait until the compliance deadline to complete this appointment. Further, we urge the Ombudsman to meet with WEDI officials and we offer to host a virtual industry session to permit this official to listen to industry issues and ask and address questions.
- The go-live ICD-10 support plan should include leveraging WEDI's and CMS' implementation support program, which already serves as the central source for collecting ICD-10 industry issues and solutions.



*Partnering for Electronic Delivery
of Information in Healthcare*

- Additional educational outreach should be offered to help providers better prepare for implementation of the new code set. Issues to focus on in this outreach should include provider compliance with most recent local coverage determination codes, joint announcement with the American Medical Association, CMS testing results, and available resources.

WEDI stands ready to assist the Secretary in implementing outreach strategies to assist the industry transition to ICD-10. We urge the Secretary to leverage WEDI's vast connections into the healthcare industry to help build a dialogue between CMS and industry action to ensure alignment of implementation efforts and go-live support. WEDI would like to request a meeting with the Secretary in order to identify key strategies that we can do together to help facilitate industry readiness.

Please contact Devin Jopp, Ed. D., President and CEO of WEDI, with any questions or to discuss the timing of a meeting. You may contact Devin at djopp@wedi.org or (202) 618-8788.

Sincerely,

Jean Narcisi
Chair, WEDI

cc:

Andrew Slavitt, Acting Administrator, Centers for Medicare & Medicaid Services
Shana Olshan, Director, National Standards Group, Centers for Medicare & Medicaid Services
WEDI Board of Directors