

May 17, 2013

The Honorable Max Baucus
Chairman
Committee on Finance
U.S. Senate
SH-511 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Orrin G. Hatch
Ranking Member
Committee on Finance
U.S. Senate
SH-104 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Jay Rockefeller
Chairman
Finance Subcommittee on Health
U.S. Senate
SH-531 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Pat Roberts
Ranking Member
Finance Subcommittee on Health
U.S. Senate
SH-109 Hart Senate Office Building
Washington, D.C. 20510

Dear Chairmen Baucus and Rockefeller and Senators Hatch and Roberts:

We are writing to express our support for the October 2014 adoption of the International Classification of Diseases, Tenth Revision, Clinical Modification (ICD-10-CM) for reporting diagnoses by all health care providers and the International Classification of Diseases, Tenth Revision, Procedure Coding System (ICD-10-PCS) for hospital reporting of inpatient procedures, collectively referred to as ICD-10. We oppose any actions to further delay full compliance with the planned adoption of ICD-10.

ICD-10 was developed as an improvement to ICD-9, to allow for more specific and accurate representation of current and future medical diagnoses than is possible with the 30-year old ICD-9 system. Although many of the signatories to this letter were at odds over the timing of implementation when the National Committee on Vital and Health Statistics (NCVHS) and HHS embraced ICD-10 – which has already been adopted outside the U.S. worldwide – we are now in agreement that any delay or deviation from the October 1, 2014 compliance date would be disruptive and costly for health care delivery innovation, payment reform, public health, and health care spending.

ICD-10 is the next generation coding system that will modernize and expand the capacity of public and private payers to keep pace with changes in medical practice and healthcare delivery. Thus, ICD-10 will provide higher quality information for measuring service quality, outcomes, safety, and efficiency. By allowing for greater coding accuracy and specificity, ICD-10 is key to collecting the information needed to implement health care delivery innovations such as patient-centered medical homes and value-based purchasing. Data is critical to supporting these new payment and delivery models, which depend on accurate data to help providers improve the effectiveness of treatments. ICD-10 will enable better patient care through better understanding of the value of new procedures, improved disease management, and an improved ability to study and understand patient outcomes.

Moreover, any delays in adoption of ICD-10 in the U.S. will make it difficult to track new and emerging public health threats. The transition to ICD-10 is time-sensitive because of the urgent need to keep up with tracking, identifying, and analyzing new medical services and treatments available to patients. Continued reliance on the increasingly outdated ICD-9 coding system is not an option.

All of the organizations below have already expended notable effort in preparing for the transition. Any further delays would add significant cost to the system and measurably increase the cost of completing the transition. In addition, significant investments have been made to date by all stakeholders, from hospitals, health systems, and physician groups to payers, vendors, clearinghouses and other associations. According to an industry survey, most vendors and providers have begun their transition efforts and are working on collaboration and testing efforts, including internal and external testing in 2013 and before ICD-10 is adopted in 2014.

We would be happy to meet with you and your staff at any time to discuss this process, as well as respond to any specific questions or concerns you have about the system.

Sincerely,

Advanced Medical Technology Association (AdvaMed)
American Health Information Management Association (AHIMA)
AMIA (American Medical Informatics Association)
BlueCross and BlueShield Association
Cepheid
Health IT Now Coalition
Medical Device Manufacturers Association
3M Health Information Systems
Roche Diagnostics Corporation
Siemens Health Services