

Top 10 List: Phase 1

ICD-10-CM/PCS Implementation Plan Development and Impact Assessment

Timeframe: First Quarter 2009–Second Quarter 2011

The implementation date for ICD-10-CM/PCS has been established as October 1, 2013, and CMS has reiterated that the date will not be delayed. (<http://www.cms.gov/ICD10/Downloads/ICD-10MythsandFacts.pdf>) This is a wide-reaching project which will impact financial and clinical systems and operational aspects throughout the organization. In early 2011, Phase 1 of the ICD-10-CM/PCS Organizational Impact Assessment will be coming to a close. The clock is ticking and now is the time to accelerate planning efforts as Phase I comes to a close in 2011. It is important to note that ICD-10-CM/PCS and 5010 implementation are not mutually exclusive; it is critical to work on both of these projects simultaneously. In other words, do not dedicate exclusive time and resources to completing 5010 implementation and then expect to start working on ICD-10-CM/PCS because the implementation of ICD-10-CM/PCS requires as much time as possible to complete all steps in each of the four phases by 2013.

The following **Top 10 List: Phase 1–ICD-10-CM/PCS Implementation Plan Development and Impact Assessment** outlines tasks to help facilitate this process. This list is intended to highlight the key areas and is to be used in tandem with the more complete “ICD-10 Preparation Checklist” at AHIMA.org/ICD10. This brief resource identifies key tasks that must be done in Phase 1 in the implementation project, but steps are not necessarily listed in the order of completion. The tasks are all interrelated and may need to be done simultaneously rather than sequentially. It is recommended that HIM professionals take an active leadership role in this project by offering expertise and sharing resources with those involved in ICD-10-CM/PCS implementation.

1. Ensure Organizational Awareness

- a. Provide organization-wide ICD-10 awareness education to key stakeholders
- b. Include senior management, information technology personnel, clinical department managers, medical staff, and all currently involved with ICD data
- c. HIM managers and coding professionals should become familiar with the format, basic structure and fundamentals of ICD-10-CM/PCS
- d. Establish and execute a communication plan for the entire health care organization

2. Establish Executive Leadership

- a. Develop multi-disciplinary steering committee to develop implementation strategy and oversee implementation process (provide oversight of the entire implementation timeline)
- b. Formulate transition strategies and identify goals
- c. Identify key stakeholders requiring awareness education and ensure education provided

2. Establish Executive Leadership *(continued)*

- d. Identify key tasks and objectives and assign to appropriate departments for follow-up
- e. Prioritize concurrent projects both related and unrelated to ICD-10-CM/PCS to ensure timelines are met

3. Perform Impact Assessment

- a. Identify range of impact on every department
- b. Analyze impact on operational processes
- c. Assess impact on documentation processes and work flow
- d. Identify impacted internal and external reporting
- e. Assess the detail in clinical documentation to determine whether it is adequate to support ICD-10-CM/PCS

4. Conduct Systems Inventory

- a. Inventory all databases and systems applications (including interfaces) using ICD-9-CM codes
- b. Perform detailed analysis of systems changes needed
- c. Request documentation from vendors on their plans to prepare for the transition

5. Complete Gap Analysis

- a. Perform GAP analysis on the areas of impact
- b. Develop a strategic organizational approach
- c. Identify and rank risks and identify any contingency plans

6. Establish Internal Timeline

- a. Develop internal implementation timeline
- b. Specify resources required to complete identified tasks
- c. Monitor timeline and update as needed

7. Determine Plan for Training

- a. Perform detailed assessment of current-day coding staff knowledge
- b. Identify the specific groups who need training (role-based)
- c. Identify at what level training needs to be provided to all categories of users
- d. Determine method and timeline for training

8. Prepare Multi-year ICD-10 Implementation Budget

- a. Perform budget assessment and procurement of needed funds to staff the transition project
- b. In this project consider:
 - i. System, hardware, maintenance fee upgrades
 - ii. Training
 - iii. Outsourcing or consultant fees
 - iv. Temporary staffing needs

8. Prepare Multi-year ICD-10 Implementation Budget (*continued*)

- v. Data conversion
- vi. Report redesign and reprinting paper forms
- vii. Additional tools or resources needed
- viii. Systems testing

9. Manage Contractual Changes

- a. Review vendor and payer contracts early and collaborate with external parties to determine modifications
- b. Identify any additional fees from vendors

10. Correlate Continued Organizational Management of 5010 Implementation Processes and Planning (required January 1, 2012)*

- a. 5010 implementation and ICD-10 implementation are NOT sequential projects, they must be concurrent projects
- b. Begin external testing of 5010 by January 1, 2011*

**For more detailed information on each step listed above,
review the AHIMA ICD-10-CM/PCS Checklist.**

References:

American Health Information Management Association. *ICD-10-CM/PCS Preparation Checklist* at <http://www.ahima.org/downloads/pdfs/resources/checklist.pdf>

Centers for Medicare & Medicaid Services. ICD-10. <http://www.cms.gov/ICD10/>

* The Workgroup for Electronic Data Interchange (WEDI)

<http://www.wedi.org/cmsUploads/pdfUpload/Generic/pub/5010timeline090211.pdf>

Note:

A Top 10 List: Phase 2—ICD-10-CM/PCS Implementation Preparation will be developed to complement the ICD-10 Preparation Checklist.

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