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What will it really take for a healthcare enterprise to be ICD-10 ready?
Commentary
by Eddie Williams & Marc Gravez

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Marc Gravez

During a recent healthcare forum, some health plan and provider representatives said they were "ready for ICD-10." Other, mostly smaller, providers expressed concern. One of the more interesting comments came from an organization that had managed their ICD-10 implementation as a "project," until they experienced a series of missteps. After realizing how many multiple interdependent projects were involved, this organization determined that they should have managed ICD-10 as a program.

> ICD-10-CM/PCS is the International Statistical Classification of Diseases, 10th Edition, and Clinical Modification/Procedure Coding System. ICD-10 is an update to ICD-9, which is 30 years old. ICD-10 is mandated by the World health Organization (WHO). In the United States, ICD-10 affects all entities covered by the Health Insurance Portability and Accountability Act (HIPAA).
>
> For an overview of ICD-10, see http://www.cms.gov/Medicare/Coding/ICD10/index.html.

Let's stop calling ICD-10 implementation a "project," because it really requires the focus and commitment of a program

For any healthcare enterprise, ICD-10 implementation is significant enough for designation as a program, with governance at that level. There are many dependencies, internal and external stakeholders, significant interfaces, vendors, and sub-contractors involved. ICD-10 affects multiple related projects, all areas of the business, and may profoundly affect your overall enterprise strategic plan.

There is significant potential conflict with ongoing work required for HIPAA, HITECH, Meaningful Use, the ACA, and so on. At many providers, work continues on projects related to these and other Federal mandates. The significance of ICD-10 is similar to Y2K, but with a much wider impact and cost. Your ICD-10 implementation plan requires realistic and thorough evaluation and estimation, including its effect on the revenue cycle and billing reimbursement.

While there have been many recent advances in healthcare business processes and information technology, the healthcare industry remains behind many others because of a lack of automation and the large number of manual activities.

There are many issues to address

Delivery of any quality enterprise solution requires management of conflicting priorities, ensuring that sufficient resources are available to do the job, and a sound testing strategy.

In general, the ICD-10 implementation issues that your organization can control are related to priorities, resources, quality, and risk. In addition, the current US political situation results in uncertainty about the future of healthcare and coverage.

Conflicting priorities

An organization may have conflicting enterprise-wide priorities for business and technology. There may be multiple conflicting ongoing projects and programs, all in approved portfolios.

Resource issues

Determining the capacity and availability of resources required to support ICD-10 can be difficult while considering the resource requirements of other enterprise initiatives.

Many resources will require training; for example, bilingual claim processing, Rx, e-prescription, and medical and clinical management.

You may need to mitigate the effect of employees or consultants moving from company to company.

A large provider is more likely to have the required resources for ICD-10 implementation, but may be challenged by conflicting priorities.

For a smaller provider, the impact, training, and cost of ICD-10 can be enormous.

Quality issues

Just four months remain before the ICD-10 compliance deadline. Program managers must ensure that all necessary quality-assurance verification and validation processes are carried out. We must verify that *all* activities and deliverables are correct before we validate and test our ICD-10 implementation. Just testing throughout the life cycle of the program and its projects is *not* enough.

End-to-end testing while implementing multiple mandates can be very difficult. A particular area of concern is that some companies or providers may not be selected to participate in full testing with all pertinent parties. For example, thorough end-to-end testing and validation of claim processing requires the successful inclusion of *all* affected health plans, clearinghouses, hospitals, practices, and so on.

Most vendors and subcontractors can effectively test the component(s) for which they are responsible. Ensuring their effective collaboration with your in-house QA team for end-to-end testing is a much bigger challenge.

Conflicting testing methodologies and different ways of doing things among vendors, subcontractors, and even different parts of your in-house team may make it hard to interpret or act on test results.

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Failing to pay attention to lessons learned or not share what was learned may cause mistakes to *not* be corrected as you try to move forward.

Risk management issues

Risk assessment, communication planning, and security planning are necessary at all levels of the organization.

Protecting sensitive/private patient or member data goes beyond ensuring that your technology is "secure." *Instead, your entire organization must understand their responsibility when it comes to security.*

Program management is responsible for and must ensure the integrated planning and execution of best practices for all supporting processes, including quality assurance, configuration management, development, and implementation.

Templates are required to support the efficient planning and implementation for *all* business areas — implementation, technical, and training.

Political issues

The national political situation results in many people failing to accept that moving forward is the optimal way to go.

Political uncertainty makes it difficult for enterprises to proactively prepare in manner ensuring readiness.

Conclusion

As an industry, in healthcare there is still a lot of remaining work (business operations and IT) to be done before the ICD-10 compliance deadline. *We must manage ICD-10 implementation as a program having mission-critical interrelated and interdependent projects*.

To mitigate the impact on all affected parties, collaboration and support are required at all organizational levels. We must always keep in mind that while ICD-10 affects health plans, clearinghouses, hospitals, practices, and so on, everything we do ultimately affects patients.

Speak up!

What are your concerns or issues regarding ICD-10 implementation in your enterprise or across the healthcare industry? Please let us know …

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Eddie R. Williams has over 25 years of experience as a program and project manager for system/software engineering, Information Technology (IT) development and management in aerospace, DOD, commercial IT and other industries such as healthcare, pharmaceutical, insurance, and academia. He has been a Project Manager, Sr. PM, Program Manager, and Sr. Program Manager. Mr. Williams has been a certified Project Management Professional (PMP) through the Project Management Institute since 1999. Before becoming a certified project and program manager, he held positions such as Systems and Procedures Analyst (programming and creating system/software specifications), Configuration Management Specialist and Manager, Software Product/Quality Assurance Engineer and Manager, Division Administrator/Manager (development methodologies, management and control).

He is also a coach/mentor and educator, has been a speaker at numerous conferences, and is the author of *Software/Firmware Configuration Management (Within the System Development Process)* and *Management Control and Quality*. In 2014 he provided program management content through the Program Management Academy: Content contribution to the 2014, Wiley publication, "*Program Management For Improved Business Results*" for University master's degree programs. Eddie can be contacted at http://www.itprofessionalfacilitator.com.

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Marc Gravez is a customer-focused technical communication professional. His passion is creating content that empowers people to learn faster, remember more, and work better, bridging the gap between what users know and technologists *think* users know. Mr. Gravez has more than 20 years of industry experience, including healthcare IT, telecom, cable, networking, banking, and engineering. He is a Past President of the Society for Technical Communication (STC) Philadelphia Metro Chapter. He can be contacted at marcgravez@gmail.com.