International Classification of Diseases, 10th Revision (ICD-10) and Risk Adjustment Discussion

September 23, 2015

Health Insurance Marketplace Program Training Series

CMS CENTERS FOR MEDICARE & MEDICAID SERVICES

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Agenda

- Session Guidelines
- Session Purpose
- ICD-10 and Risk Adjustment Overview
- ICD-10 Mapping
- ICD-10 Next Steps
- ICD-10 FAQs and Resources
- Questions
- Closing Remarks

Session Guidelines

- This is a ninety-minute webinar session.
- Frequently Asked Questions (FAQs) will be posted in the coming weeks.
- For questions regarding content, please submit inquiries to REGTAP at https://www.regtap.info/.
- For questions regarding logistics and registration, please contact the Registrar at: (800) 257-9520.

Intended Audience

- Issuers of Marketplace and Non-Marketplace plans, in states where the Department of Health and Human Services (HHS) operates the Risk Adjustment (RA) and Reinsurance programs.
- Third Party Administrators (TPAs) and support vendors.
- Amazon and On-Premise EDGE server issuers (Marketplace and Non-Marketplace).

Purpose

To provide information about ICD-10 implementation, application, and impact on the Risk Adjustment program.

ICD-10 AND RISK ADJUSTMENT OVERVIEW

Overview

- ICD-10 diagnosis codes become effective October 1, 2015.
- All diagnosis codes for EDGE server medical claims **must include** ICD-10 codes for claims with dates of service **on or after October 1, 2015**.

Overview

- On August 13th 2015, CCIIO published the "Draft Fiscal Year 2016 ICD-10 Crosswalk for HHS-HCC Risk Adjustment Model" and an overview companion document.
- The overview document described our approach to mapping ICD-10 codes in the HHS-operated risk adjustment model.
- The crosswalk shows what Hierarchical Condition Category (HCC) maps to each ICD-10 code.

Draft ICD-10 Mapping Comments

- CMS requested public comment by August 31st from issuers regarding the crosswalk.
- Comments focused on the following areas:
  - o Requesting inclusion of certain diagnoses or groups of diagnoses in the RA model.
  - o Requesting guidance on handling claims with service dates beginning before 10/1/15 and ending on or after 10/1/15 date.
  - o Identifying consistency errors.

CMS Response

- CMS considered all comments:
  - o Requests for inclusion of additional diagnoses may be considered when CMS recalibrates the model in the future.
  - o Guidance on claim-specific scenarios will be addressed during a DDC/EDGE server webinar in early October.
  - o A quality check was performed and the posted draft mapped ICD-10 codes are accurate and, as intended, based on clinical judgment, CMS policy decisions, and alignment with the HHS-HCC classification.

Final ICD-10 Crosswalk

- Since no errors or consistency issues were found, CMS has determined that the information in the draft crosswalk represents the final version.
- CMS will publish the final ICD-10 crosswalk within the updated “HHS-Developed Risk Adjustment Model Algorithm Software” instructions and tables, around mid-October 2015.
- The documents will be posted on the CMS webpage under the section labeled “Premium Stabilization Programs,” under “Regulations & Guidance” (https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/index.html).

ICD-10 MAPPING

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ICD-10 Mapping

- The diagnostic classification system underlying the HHS-operated risk adjustment model begins by mapping all ICD-9 or ICD-10 diagnosis codes to diagnostic groups, or DXGs, and then mapping the DXGs to HCCs.
- The ICD-10 crosswalk maps ICD-10 diagnosis codes to HHS-operated risk adjustment HCCs.
- The mapping process included careful examination and spanned multiple years.
- CCIIO relied on **General Equivalence Mappings (GEMs)**, certified coders, clinical review, and analysis.

ICD-10 Mapping

- ICD-9 Codes: Over 14,500 diagnosis codes.
- ICD-10 Codes: 70,000 diagnosis codes
  - include changes in the code structure.
  - include changes in specificity.
  - include changes in underlying clinical classification.
- Variances between ICD-9 and ICD-10 in terms of code structure, specificity, and underlying clinical classification necessitated differences between the crosswalks in some instances.

One-to-One Conversion

ICD-9	ICD-10
733.6	M94.0
Tietze’s Syndrome	Tietze’s Syndrome

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One-to-Four Conversion

ICD-9	ICD-10
649.51	O26.851 spotting complications during pregnancy, first trimester
spotting complications during during pregnancy	O26.852 spotting complications during pregnancy, second trimester
null	O26.853 spotting complications during pregnancy, third trimester
null	O26.859 spotting complications during pregnancy, unspecified trimester

What are GEMs?

- GEMS were developed over a period of 3 years by CMS and the Centers for Disease Control (CDC), with input from clinicians, coding experts and cooperating parties that included representatives from CMS,CDC, the American Hospital Association (AHA) and the American Health Information Management Association (AHIMA).
- GEMs are a tool used to convert data from ICD-9 to ICD-10 and vice versa. They are referred to as a crosswalk linking codes of one (1) system with codes in the other system.
- GEMs are a comprehensive translation dictionary.

What are GEMs?

GEMs may be used for:

1. Tracking quality,
2. Calculating reimbursement, or
3. Converting any ICD-9 codes to ICD-10 codes such as:
   a. Payment Systems.
   b. Payment and Coverage edits.
   c. **Risk Adjustment logic.**
   d. Quality Measures.

What are GEMs?

- The GEMs include forward mappings (ICD-9 to ICD-10) and backward mappings (ICD-10 to ICD-9). For risk adjustment purposes, CCIIO used the **GEMs backward mappings**.
- This approach allowed us to map most ICD-10 codes to ICD-9 codes (or directly to DXGs) and use our existing crosswalks to map ICD-9 codes to DXGs and then DXGs to HCCs.
- **NOTE:** GEMs are not a substitute for learning how to use ICD-10 but a tool to assist with converting the codes.

ICD-10 Combination Mapping

- ICD-10 codes with multiple concepts frequently have combination mappings (e.g., 1:2 or 1:3), and the GEMs may include a mix of 1:1 and combination mappings to choose from.
- Some ICD-9 CM codes map easily to an ICD-10 in a simple one-to-one conversion. **NOTE: an exact map does not always mean the codes match based on detail.**
- In general, when given the choice of a single mapping or a combination mapping, CCIIO selected combination mappings to better match ICD-9, which means these ICD-10 codes could map to **more than one (1) HCC**.

ICD-10 Combination Codes

- A combination code is defined as a diagnosis code encompassing two (2) or more clinical conditions.
- Combination codes exist in the ICD-9 classification also, but are more prevalent and extensive in ICD-10.
- A majority of the ICD-10 combination codes contain the underlying conditions as well as associated symptoms or manifestations.
- Under ICD-9, the conditions in many instances would be coded separately.

ICD-10 Combination Codes

- ICD-10 combination codes add more specificity.
- The additional level of specificity requires greater emphasis on abstracting information from the medical record.
- This will require more specific provider documentation within the medical record, to justify the higher level of specificity.

ICD-10 Combination Codes – Example 1

- ICD-9: Pressure ulcers
  - o Two (2) codes would be assigned: one (1) for the ulcer and one (1) for the stage **707.01, 707.22**
- ICD10: Pressure ulcers
  - o There are nearly six (6) pages of pressure ulcer combination codes that identify the site, stage of ulcer and laterality – all in one (1) code.
    - **L89.013** - pressure ulcer of the right elbow, stage 3

ICD-10 Combination Codes – Example 2

- ICD-9: Type 2 diabetes with mild nonproliferative retinopathy
  - 250.52 - type 2 diabetes with ophthalmic manifestations, with macular edema
  - 362.04 - mild nonproliferative diabetic retinopathy
  - 362.07 - diabetic macular edema
- ICD-10: Type 2 diabetes with mild nonproliferative retinopathy with macular edema
  - **E11.321** - type 2 diabetes mellitus with mild nonproliferative diabetic retinopathy with macular edema

ICD-10 NEXT STEPS

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Updates

- Currently the ICD-10 reference tables located within EDGE will be updated during a maintenance release that is scheduled for November 3, 2015.
- On October 6, 2015, a training event addressing ICD-10 claim type submission questions and scenarios will be scheduled, so please look for the announcements at www.REGTAP.info.

Reminders

Medical File – Dental and Vision Default ICD-10 Diagnosis Code

- CMS was asked what the default ICD-10 Diagnosis Code value would be for submission of dental and vision claims. For services rendered after October 1, 2015, the ICD-10 default Diagnosis Code to use for dental services is Z0120 and for vision services is Z0100.

Medical and Supplemental – Reminder About Use of ICD-9 Stem Codes

- CMS would like to remind issuers that they may only submit ICD-9 "stem" Diagnosis Codes on claims with dates of service prior to October 1, 2015.
- ICD-10 diagnosis codes are required on claims with dates of service as of October 1, 2015 and thereafter.
- The EDGE server will not accept "stem" diagnosis codes for ICD-10.

ICD-10 FAQs and Resources

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ICD-10 REGTAP FAQs

ITMS FAQ #13033

Q: Does the one-year period of claims payment leniency for International Classification of Diseases, 10th Revision (ICD-10) codes apply for the Department of Health and Human Services (HHS)-operated Risk Adjustment (RA) program?

A: No, the guidance applies only to Medicare fee-for-service claims from physician or other practitioner claims billed under the Medicare Fee-for-Service Part B physician fee schedule. HHS-operated RA program remains unchanged and follows current clinical coding guidelines that require an accurate diagnosis accompanied by a valid code.

ITMS FAQ #13034

Q: Does your guidance change coding guidelines?

A: No, the coding guidelines are unchanged.

ICD-10 Implementation Resources

- CMS website: https://www.cms.gov/Medicare/Coding/ICD10/index.html
- CMS FAQs:

  https://www.cms.gov/Medicare/Coding/ICD10/Clarifying-Questions-and-Answers-Related-to-the-July-6-2015-CMS-AMA-Joint-Announcement.pdf
- GEMs:

  https://www.cms.gov/Medicare/Coding/ICD10/2015-ICD-10-CM-and-GEMs.html

Questions?

To submit questions by phone:

- *dial '14' on your phone's keypad*
  - *dial '13' to withdraw your question*

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Resources

Resource	Resource Link
U.S. Department of Health & Human Services	http://www.hhs.gov/
Centers for Medicare & Medicaid Services (CMS)	http://www.cms.gov/
The Center for Consumer Information & Insurance Oversight (CCIIO) web page	http://www.cms.gov/cciio
Consumer website on Health Reform	http://www.healthcare.gov/
Registration for Technical Assistance Portal (REGTAP) - presentations, FAQs	https://www.REGTAP.info
Do-It-Yourself (DIY) Software	http://www.cms.gov/cciio/Resources/Regulations-and-Guidance/index.html#Premium_Stabilization_Programs http://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/DIY-instructions-5-20-14.pdf

Resources (Continued)

Resource	Resource Link
Patient Protection and Affordable Care Act (ACA)	http://www.gpo.gov/fdsys/pkg/PLAW-111publ148/content-detail.html
Standards Related to Reinsurance, Risk Corridors, and Risk Adjustment under the ACA	http://www.gpo.gov/fdsys/pkg/FR-2011-07-15/pdf/2011-17609.pdf
HHS Notice of Benefit and Payment Parameters for 2014 and Amendments to the HHS Notice of Benefit and Payment Parameters for 2014	http://www.gpo.gov/fdsys/pkg/FR-2013-03-11/pdf/2013-04902.pdf
HHS Notice of Benefit and Payment Parameters for 2015 and Amendments to the HHS Notice of Benefit and Payment Parameters for 2015	http://www.gpo.gov/fdsys/pkg/FR-2014-03-11/pdf/2014-05052.pdf

Resources (Continued)

Resource	Resource Link
HHS Notice of Benefit and Payment Parameters for 2015 and Amendments to the HHS Notice of Benefit and Payment Parameters for 2016	http://www.gpo.gov/fdsys/pkg/FR-2015-02-27/pdf/2015-03751.pdf
Standards Related to Reinsurance, Risk Corridors and Risk Adjustment under the ACA	http://www.gpo.gov/fdsys/pkg/FR-2012-03-23/pdf/2012-6594.pdf
Program Integrity: Exchange, Premium Stabilization Programs, and Market Standards; Amendments to the HHS Notice of Benefit and Payment Parameters for 2014	http://www.gpo.gov/fdsys/pkg/FR-2013-10-30/pdf/2013-25326.pdf
Health Insurance Market Rules, Rate Review Final Rule	http://www.gpo.gov/fdsys/pkg/FR-2013-02-27/pdf/2013-04335.pdf

Resources (Continued)

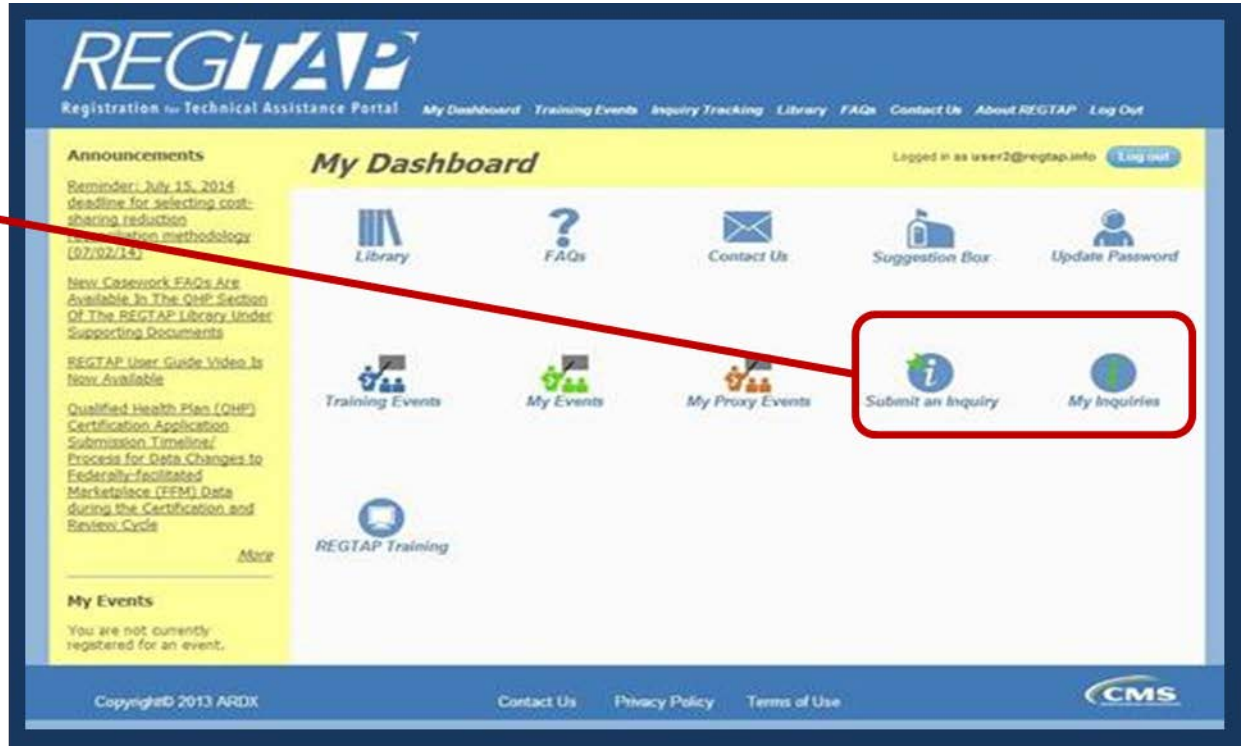
ICD-10 Implementation Resources

Resource	Resource Link
ICD-10 Implementation on the CMS Website	https://www.cms.gov/Medicare/Coding/ICD10/index.html
Clarifying Questions and Answers Related to the July 6, 2015 CMS/AMA Joint Announcement and Guidance Regarding ICD-10 Flexibilities (CMS FAQs)	https://www.cms.gov/Medicare/Coding/ICD10/Clarifying-Questions-and-Answers-Related-to-the-July-6-2015-CMS-AMA-Joint-Announcement.pdf
2015 ICD-10-CM and GEMs	https://www.cms.gov/Medicare/Coding/ICD10/2015-ICD-10-CM-and-GEMs.html

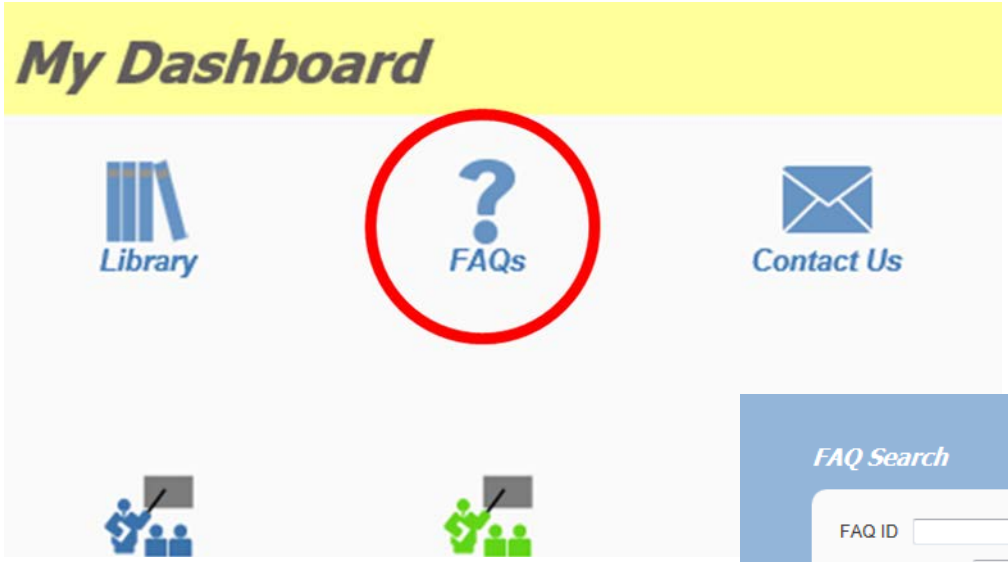
Inquiry Tracking and Management System (ITMS)

Stakeholders can submit inquiries to ITMS at https://www.REGTAP.info

Select 'Submit an Inquiry' from My Dashboard.

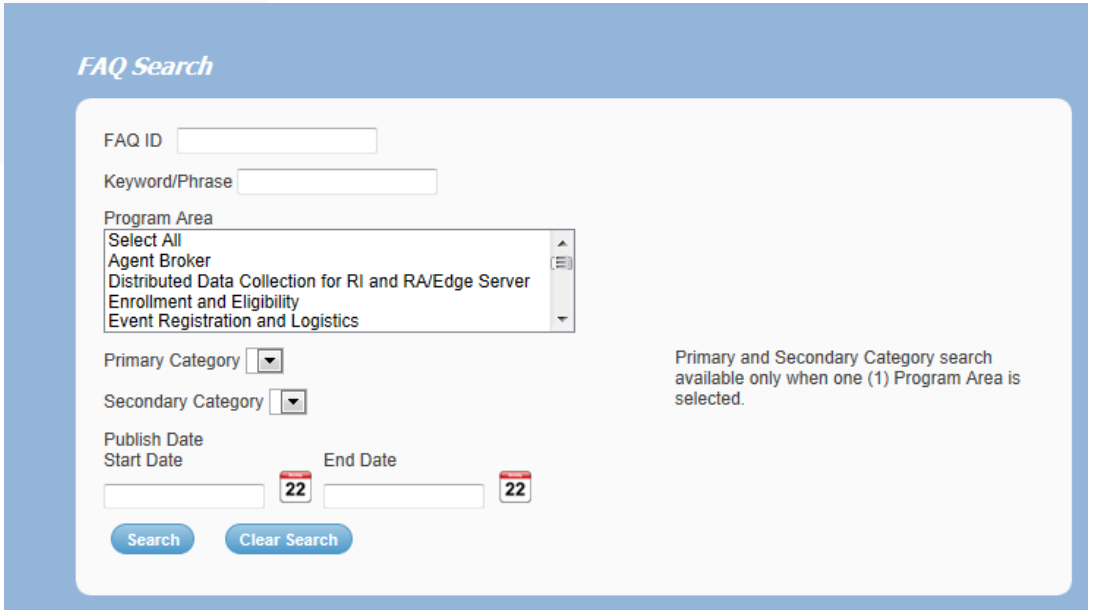


FAQ Database on REGTAP



The FAQ Database allows users to search FAQs by FAQ ID, Keyword/Phrase, Program Area, Primary and Secondary categories, and Publish Date.

FAQ Database is available at https://www.REGTAP.info/



Closing Remarks

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