March 25, 2014

Ms. Marilyn Tavenner
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201
Submitted via email: marilyn.tavenner@cms.hhs.gov

RE: Adoption of the International Classification of Diseases, Tenth Revision, Clinical Modification (ICD-10-CM) and International Classification of Diseases, Tenth Revision, Procedure Coding System (ICD-10-PCS)

Dear Administrator Tavenner:

The American Academy of Neurology (AAN) is the premier national medical specialty society for neurology representing more than 27,000 neurologists and clinical neuroscience professionals. It is dedicated to promoting the highest quality patient-centered neurologic care. A neurologist is a physician with specialized training in diagnosing, treating, and managing disorders of the brain and nervous system such as Parkinson’s disease, Alzheimer’s disease, stroke, epilepsy, migraine, multiple sclerosis, and brain injury.

The AAN is supportive of the October 2014 adoption date for the ICD-10 code sets and agrees with the Centers for Medicare & Medicaid Services (CMS) position that no further delays are necessary. We believe that the one year delay struck a sensible balance that provided sufficient time for practicing physicians to become compliant and to make the requisite investments/improvements to their systems. In fact, for the past few years, the AAN has been committed to educating and preparing neurologists for the transition to ICD-10 by hosting webinars, offering lectures at annual meetings and state neurological society meetings, and providing directed content on our website.

We understand that ICD-10 was developed as an improvement to ICD-9 to allow for more specific and accurate representation of medical diagnoses that will expand the capacity of payers to keep pace with the changes in medical practice and healthcare delivery. By allowing for greater coding accuracy and specificity, ICD-10 will provide higher quality information for measuring service quality, outcomes, safety and efficiency. The AAN supports all of these objectives.
However, we are writing to express serious concern about the devastating impact physician practices will likely experience if smaller vendors’ systems are not fully tested and ready to accept and process claims on October 1, 2014. While we strongly support the numerous benefits that the ICD-10 transition will afford the US healthcare system, we would be remiss if we did not stress that it is equally important that vendors’ systems should have undergone testing to ensure their infrastructure is equipped to process claims expeditiously and without any delays to providers. As such, we respectfully request that CMS require vendors to provide written assurances that their systems will be fully operational and ready to accept and process ICD-10 claims in a timely manner by October 1, 2014. Otherwise, physicians should be held harmless from the financial burden that delayed payments will undoubtedly create. We propose that vendors unable to process claims rapidly and accurately using ICD-10 codes be held accountable by the imposition of a penalty and interest payment to providers whose payments have been delayed or withheld. The percentage of claims denied should also be drastically reduced for at least the first month.

The AAN appreciates the opportunity to provide written comments on this important topic. Should you have questions about our comments or require further information, please contact Daneen Grooms, MHSA, Manager of Regulatory Affairs, at dgrooms@aan.com or (202) 525-2018.

Sincerely,

Timothy A. Pedley MD, FAAN
President, American Academy of Neurology