

Testing, Testing: An IT Perspective on ICD10

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HIPAA COW



Getting Started...

What is HIPAA COW?

The **H**ealth **I**nsurance **P**ortability and **A**ccountability **A**ct **C**ollaborative **O**f **W**isconsin (HIPAA COW), established in 2001, is a non-profit organization open to entities considered to be Covered Entities, Business Associates, and/or Trading Partners under HIPAA, as well as any other organization impacted by HIPAA regulations.



Getting Started...

What does HIPAA COW do?

The mission of HIPAA COW is to:

- Assist HIPAA Covered Entities, Business Associates, and other interested parties in implementing HIPAA's Privacy, Security and EDI Standard Transaction provisions, as amended over time.
- Foster public education about HIPAA.
- Facilitate and streamline HIPAA Implementation through identification of best practices.
- Reduce duplicate efforts among entities obligated to comply with HIPAA.
- Offer opportunities for partnering and collaborating between entities implementing HIPAA.
- Identify and evaluate new or difficult HIPAA interpretation issues.



How does ICD10 testing involve HIPAA?

- 837 v. 5010 accommodates the ICD10 code set
- Testing will involve Standard Transactions defined in the HIPAA regulations.
- Covered Entities under HIPAA are defined as those utilizing these Standard Transactions, i.e. 837 v. 5010 claims.
- While the migration to ICD10 touches on many business processes that are not related to EDI (electronic data interchange), the HIPAA COW EDI networking group has had the most involvement with ICD10.



What are we going to discuss today?

- Setting proper testing expectations for clearinghouse and payer testing
- Internal (host system) ICD10 testing work
- External (clearinghouse/payer) ICD10 testing work
- Testing status of some specific payers
- Resources for ICD10 testing



Setting Proper Testing Expectations

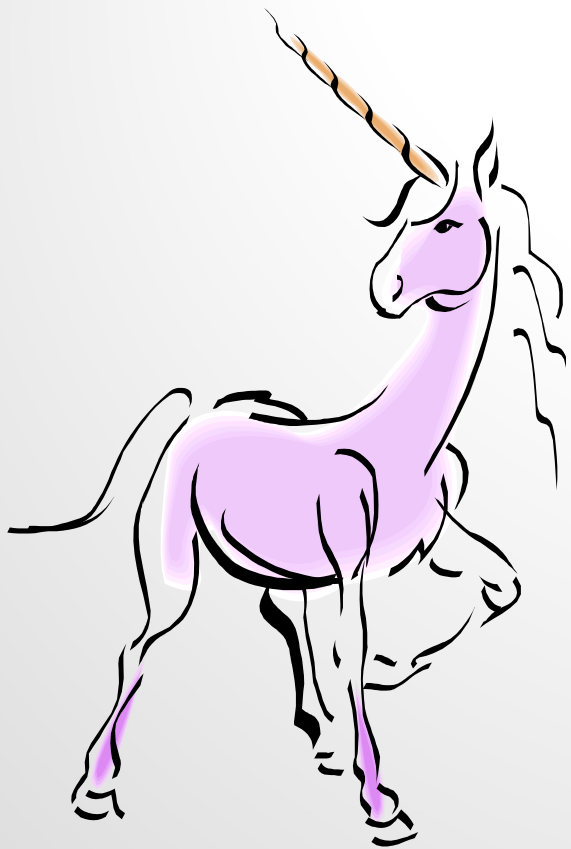
In a perfect world...

- ...all of your trading partners will be completely ready for ICD10 on October 1st.
- ...the majority of those trading partners would be able to complete full end-to-end testing specific to your organization.



Setting Proper Testing Expectations

In a perfect world...



Setting Proper Testing Expectations

In the REAL world...

- ...you need to be realistic about the risk that you and your clearinghouse can mitigate.
- ...you need to define a plan to document WHAT you can test, WHO is responsible for that testing, and WHEN it can be accomplished.
- ...you need to execute that plan.



- Internal (host system) ICD10 Testing Work

Complete your preparation...

- ...set up test cases using real scenarios
- ...determine the ICD9 codes that your entity uses the most
- ...use your system's reporting capabilities to find claims that contain those "high volume" ICD9 codes
- ...create copies of those claims and replace the ICD9 codes with the appropriate ICD10 codes
- ...your "new" ICD10 claims can be used to test your host system's editing capabilities
- ...and document your use cases and data gathering work!



- Internal (host system) ICD10 Testing Work

You can test...

- ...if your host system allows for entry of ICD10 codes with date of service $\geq 10/1/2014$ (it SHOULD)
- ...if your host system stops claims that have both ICD9 and ICD10 codes (it SHOULD)
- ...if your host system stops claims with ICD10 codes and date of service $< 10/1/2014$ (it SHOULD)
- ...if your host system stops claims with ICD9 codes and date of service $> 10/1/2014$ (if SHOULD)



- External (clearinghouse/payer) ICD10 Testing Work

Be realistic...

- ...most payers are not set up to handle direct provider testing; they plan to test with direct submitters and clearinghouses. Some do have web-based testing tools available.
- ...most clearinghouses are not engaged in provider-level testing but rather are using the valid ICD10 test data they have received from whatever providers have been able to supply it in order to complete testing with payers.
- ...NO payer will be able to do complete end-to-end testing, no matter what they state. NO payer has a complete copy of the production environment available for testing the complete adjudication cycle.



- External (clearinghouse/payer) ICD10 Testing Work

You can test...

- ...if your clearinghouse vendor's system allows for ICD10 codes with date of service $\geq 10/1/2014$ (it SHOULD)
- ...if your clearinghouse vendor's system stops claims that have both ICD9 and ICD10 codes (it SHOULD)
- ...if your clearinghouse vendor's system stops claims with ICD10 codes and date of service $< 10/1/2014$ (it SHOULD)
- ...if your clearinghouse vendor's system stops claims with ICD9 codes and date of service $> 10/1/2014$ (if SHOULD)



- External (clearinghouse/payer) ICD10 Testing Work

You can communicate with your clearinghouse...

- ...to get it YOUR ICD10 test data for it to use in its payer and trading partner testing.
- ...to see what if any feedback you can expect on the ICD10 test data submitted, both from the clearinghouse and from the payers.
- ...to find out the status of its ICD10 testing with various payers and other trading partners.
- ...to find out what contingency plans it may have relative to payers and trading partners that are NOT ready to accept ICD10 as of 10/1/2014.



- Testing Status of Some Specific Payers

Medicare (NGS MAC in Wisconsin)

- ...held a testing week in early March along with other MACs.
- ...test claims received a 277CA or 999 acknowledgement to confirm they were accepted or rejected in their system.
- ...their testing did NOT confirm claim payment or produce test 835s (remits).
- ...testing was positioned as being for entities with “direct connections” to NGS, i.e. clearinghouses and large providers.



- Testing Status of Some Specific Payers

Medicare (NGS MAC in Wisconsin)

- ...NGS CEDI (www.ngscedi.com/ngs/portal/ngscedi) has information on “Limited end-to-end ICD10 testing” taking place for DME in July (only 32 organizations will be selected from all volunteers per jurisdiction).
- ...deadline is March 24th to submit volunteer form.



- Testing Status of Some Specific Payers

Forward Health (Wisconsin Medicaid)

- ...has an ICD10 Transition web page (<https://www.forwardhealth.wi.gov/WIPortal/Tab/42/icsccontent/html/ICD10/ICD10Home.htm.spage#>)
- ...has the following on their ICD10 FAQ regarding testing:

Date: 01/14/2014

Question: When will ForwardHealth be offering testing with outside entities? Which transactions will the testing include?

Revised Answer: ForwardHealth anticipates releasing testing information on the ICD-10 Code Set Transition page on the ForwardHealth Portal in the summer of 2014. Specific testing details, including the start date for when testing may begin, will be communicated in the future.



- Testing Status of Some Specific Payers

Anthem Blue Cross/Blue Shield

- ...references ICD10 testing on its website (<http://www.anthem.com/ICD-10>)
- ...has both Ramp Manager (web portal file upload) testing and selected provider End-to-End testing. The latter involved Anthem providing data to the selected providers to then generate test claim files that were to be submitted via their clearinghouse.



- Testing Status of Some Specific Payers

Other National Payers:

- United Healthcare
- Aetna
- Cigna



- Testing Status of Some Specific Payers

Other Wisconsin payers:

- WEA Trust
- Security Health Plan
- Dean Health Plan
- Unity Health Plan
- WPS Commercial
- Network Health



- Where can I see all the payers' ICD10 testing options?

The HIPAA COW EDI Networking Group is working to put together a list of payers (government, large national, and local payers) and list what ICD10 testing options exist along with specific website links to get to their ICD10 testing pages.

Look for this on the HIPAA COW website in April of this year!



- So...What's Next?

- Determine your highest-volume payers...
- Talk to your vendor/clearinghouse to determine what testing is possible...
- Assemble your test data...
- Test as much and as far as is possible...
- Document your testing results...
- Determine what contingency plans exist...



Resources

- <http://www.roadto10.org>
- <http://www.wicd10.org>
- <http://www.cms.gov/Medicare/Coding/ICD10>
- <http://cms.gov/Medicare/Coding/ICD10/ProviderResources.html>



Thank You!

Questions / Discussion?



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