MARSH

New Workers'

Compensation Coding

Oct. 1: Are You Ready?

System Goes Into Effect

INSIGHTS

Transitioning to ICD-10 July 2015

В

BOARD DISCUSSION

Getting ready for ICD-10

ICD-10 calls for greater specificity in diagnoses, potentially enabling more effective tracking of injury reporting and greater accuracy in CMS reimbursements.

Reporting agents should test their systems for ICD-10 compliance, understand how to apply new codes, and have tools available to convert codes from ICD-9.

Employers will soon have to adopt a new system for coding and reporting workplace injuries and illnesses that could help them improve their claims reimbursement rates. Effective October 1, 2015, all entities covered under the Health Insurance Portability and Accountability Act (HIPAA) will be required to use the International Classification of Diseases, Modification, and Procedural Coding Systems (ICD-10) to report injuries and illnesses to the Centers for Medicare & Medicaid Services (CMS). CMS has directed that responsible reporting entities — including workers' compensation insurers and claims administrators — will also need to adopt ICD-10. Employers need to understand how ICD-10 will affect them and how they can ensure their claims administrators and reporting agents comply with the new rule.

ICD-10 VERSUS ICD-9

Currently, non-group health plans are required to use ICD-9 codes to report workers' compensationrelated injuries to CMS, which has become an outdated method of classifying injuries and illnesses. Because new injuries and illnesses cannot be added to the system, CMS often has insufficient information about the specific nature of injuries and illnesses. This has contributed to a reduction in reimbursement to workers' compensation payers over the last several years.

The passage of HIPAA in 1996 mandated the adoption of a new, universal standard for diagnosis coding. Although the deadline has twice been extended, there has been no indication from Congress, the Department of Health and Human Services, or CMS that the October 1, 2015, deadline will be extended again.

IMPROVEMENT FOR EMPLOYERS

ICD -10 allows for greater specificity of diagnoses because the codes have five to seven characters, compared to the three to five characters used in ICD -9. And once adopted, hospitals and other providers will be able to provide more detailed descriptions of patient conditions in medical records and other documentation. Most notable is the introduction in ICD-10 of laterality — for example, whether an injury is to the patient's left or right arm, leg, or other body part.

The additional information that can be conveyed via ICD-10 codes can affect the delivery of impact utilization management services, including pre-certification and nurse case management. For employers and their claims administrators, these improvements should translate into better quality measurement, better reporting and injury tracking capabilities, and greater accuracy for reimbursement.



MANAGING THE TRANSITION

HIPAA only applies to certain covered entities, such as health care providers, health insurance plans, and entities that process or serve as "clearinghouses" for health care information. But in January 2015, CMS issued a technical alert noting that workers' compensation payers and other responsible reporting entities must use ICD-10 for all claims with a date of injury on or after October 1, 2015. Claims with a date of injury before October 1 can be reported using either ICD-9 or ICD-10, but the two codes cannot be mixed for any single claim.

For many organizations, converting all pre-October 1, 2015, claims to ICD-10 may be costly and timeconsuming. But for high-dollar value claims or high-profile claims that an employer expects it will need to manage for some time into the future, it could be beneficial to consistently use ICD-10. Ultimately, it may boil down to case-by-case decisions. However, it is important to establish and maintain a consistent method to report claims.

For claims for injuries on or after October 1, 2015, employers should ensure their software and technology allows for the coding of ICD-10.

To help achieve the proper management of both types of claims, it's important to:

- Ensure that reporting agents are ready for the transition to ICD-10, working with CMS to test their systems for ICD-10 compliance before October 1 1, 2015.
- Train claims adjusters and others on how to apply new ICD-10 codes.

- Have accessible, easy-to-use tools to look up ICD-10 codes and convert codes from ICD-9 to ICD-10.
- Make sure the bill-review agent has processes in place that share injury code data with the employer's CMS data reporting system in order to eliminate any discrepancies between ICD-9 and ICD-10 codes being populated for any pre-October 1, 2015, claims.

For more information, contact:

TOM RYAN

Workers' Compensation Market Research Leader +1 212 345 1313 thomas.f.ryan@marsh.com

ABOUT THIS BRIEFING

This briefing was prepared by Marsh's Workers' Compensation Center of Excellence (COE), in conjunction with Franco Signor, a leading national Medicare secondary payer compliance firm. Franco Signor provides mandatory insurer reporting, conditional payment resolution, Medicare set-aside, and MSP audit solutions to the insurance industry's largest employers, insurers, and third-party administrators.

Through MPACTSM, our integrated approach to reducing workers' compensation total cost of risk, Marsh's Workers' Compensation COE can help you diagnose and address your unique risks. Our customized solutions include audits of claims administrators and pharmacy benefit managers to confirm they have in place innovative tools, programs, and system triggers to drive favorable claims outcomes and cost savings.

Marsh is one of the Marsh & McLennan Companies, together with Guy Carpenter, Mercer, and Oliver Wyman.

This document and any recommendations, analysis, or advice provided by Marsh (collectively, the "Marsh Analysis" are not intended to be taken as advice regarding any individual situation and should not be relied upon as such. The information contained herein is based on sources we believe reliable, but we make no representation or warranty as to its accuracy. Marsh shall have no obligation to update the Marsh Analysis and shall have no liability to you or any other party arising out of this publication or any matter contained herein. Any statements concerning actuarial, tax, accounting, or legal matters are based solely on our experience as insurance brokers and risk consultants and are not to be relied upon as actuarial, tax, accounting, or legal advice, for which you should consult your own professional advisors. Any modeling, analytics, or projections are subject to inherent uncertainty, and the Marsh Analysis could be materially affected if any underlying assumptions, conditions, information, or factors are inaccurate or incomplete or should change. Marsh makes no representation or warranty concerning the application of policy wording or the financial condition or solvency of insurers or reinsurers. Marsh makes no assurances regarding the availability, cost, or terms of insurance coverage. Although Marsh may provide advice and recommendations, all decisions regarding the amount, type or terms of coverage are the ultimate responsibility of the insurance purchaser, who must decide on the specific coverage that is appropriate to its particular circumstances and financial position.

Copyright © 2015 Marsh LLC. All rights reserved. MA15-13548 18556