AMERICA'S HOSPITALS AND HEALTH SYSTEMS

December 5, 2014

The Honorable John Boehner Speaker of the House U.S. House of Representatives Washington, DC 20515

The Honorable Nancy Pelosi Minority Leader U.S. House of Representatives Washington, DC 20515 The Honorable Harry Reid Majority Leader United States Senate Washington, DC 20510

The Honorable Mitch McConnell Minority Leader United States Senate Washington, DC 20510

Dear Speaker Boehner, Majority Leader Reid, and Minority Leaders Pelosi and McConnell:

As the organizations representing more than 5,000 hospitals and health systems across the country, we strongly support the announced October 1, 2015 ICD-10 compliance date and oppose any steps to delay this implementation date.

Recent ICD-10 implementation delays have been disruptive and costly for hospitals and health systems, as well as to health care delivery innovation, payment reform, public health, and health care payment. As you know, significant investments were made by the health care community, and our hospital members, to prepare for the October 2014 implementation prior to enactment of the most recent delay. The delay added billions of dollars in extra costs. Many of our members had to quickly reconfigure systems and processes that were prepared to use ICD-10 back to ICD-9. Newly trained coders who graduated from ICD-10 focused programs were unprepared for use of the older code set and needed to be retrained back to using ICD-9. Further, training of existing coders needed to be repeated given the one-year delay. This results in a doubling of costs that are not productive. A further delay would only add additional costs as existing investments would be further wasted and future costs would grow.

Hospitals are working with the Department of Health and Human Services to ensure a smooth and successful transition in 2015. We support the recently announced end-to-end testing dates issued by Centers for Medicare & Medicaid Services and are encouraging all of our members to participate in these opportunities. In addition, our hospital members are engaging in significant efforts to be ready for the 2015 implementation, including supporting their affiliated physicians, working with their payers, and conducting training and outreach initiatives for clinicians and coders.

We urge Congress to avoid any further delays of this needed coding update. ICD-9 is outdated and ICD-10 is needed to keep up with advances in medicine and ensure accurate payment. We would be happy to meet with you or your staff to discuss this transition or respond to any questions or concerns.

Sincerely,

America's Essential Hospitals
American Hospital Association
Association of American Medical Colleges
Catholic Health Association of the United States
Children's Hospital Association
National Association of Psychiatric Health Systems
Premier healthcare alliance
VHA Inc.