ICD-10 Compliance Date Delay

On April 1, 2014, the President signed the Protecting Access to Medicare Act of 2014 (the “Act”), which delays the implementation of ICD-10 diagnostic and procedure codes. The Act prohibits the Secretary of Health and Human Services from adopting ICD-10 code sets any earlier than October 1, 2015. Accordingly, Cigna will not accept ICD-10 codes until the new compliance date, which will be on or after October 1, 2015.

In the year ahead

We will continue our transitional work on ICD-10 and await further direction from the Centers of Medicare & Medicaid Services.

We will continue to test with our trading partners, vendors and major clearinghouses that submit directly to Cigna, and with a pre-selected group of health care professionals through early May 2014. At this time, we do not have plans to extend external testing further in 2014.

We will be focusing our efforts on the ability to continue to accept ICD-9 codes, and will monitor developments and provide additional updates regarding our ICD-10 implementation plans as they are available.

Frequently Asked Questions

About ICD-10

What are the benefits of the ICD code transition?
The ICD-10 code system contains more detail about the services our customers receive, generating better data on procedure and diagnosis trends.

What does the ICD-10 compliance date delay mean for Cigna?
Cigna will continue to support and accept ICD-9 codes until the new compliance date. We will not accept ICD-10 codes until the new compliance date.

Who is Cigna working with in the industry?
We are collaborating with other stakeholders in the industry (e.g., America’s Health Insurance Plans [AHIP] and the Workgroup for Electronic Data Interchange [WEDI]) to understand the internal and external affects ICD-10 and the delay may have on the industry.

What are Cigna’s top priorities when implementing ICD-10?
Our top priorities include:

- Providing health care professionals with information and support regarding the ICD-10 transition.
- Collaborating with our trading partners and vendors to support the transition to ICD-10.
- Completing business readiness monitoring plans and training.
What should health care professionals expect?
- We do not anticipate delays in payment during the transition to ICD-10.
- We do not anticipate changes to health care professional care designation with the transition to ICD-10.
- We do not anticipate changing health care professional contracts to address ICD-10. Consistent with CMS guidance, the ICD-10 transition is expected to be budget neutral.

How will health care professionals be informed of Cigna’s progress?
We will continue to communicate updates regarding our progress to health care professionals and hospitals through:
- Our quarterly health care professional newsletter, Network News
- Frequently Asked Questions (FAQs) available on the Cigna for Health Care Professionals website (CignaforHCP.com)
- Cigna health care professional service representatives
- For more information, contact your health care professional service representative, or call Customer Service at 1.800.88Cigna (882-4462).

Preparing for ICD-10 implementation

What do you recommend health care professionals do during the compliance date delay?
We recommend that all health care professionals continue ICD-10 remediation and training efforts to ensure you are prepared to transition when further guidance becomes available. For example, we suggest:
- If you use an electronic medical record, verify with your vendor that the system is ICD-10 compliant.
- If you use a superbill form to document the patient visit, update the form to reflect both ICD-9 and ICD-10 diagnosis codes so you can become familiar with the ICD-10 equivalent.
- Continue with ICD-10 coding and documentation training for your clinical staff and medical coders.
- Focus on adding greater specificity to clinical documentation. In your clinical notes, indicate location or laterality, encounter type, acute versus chronic, degree of illness, and other data elements supported by ICD-10.

What has Cigna done to prepare for ICD-10 implementation?
Cigna has taken the following steps to prepare:
- Completed remediation of system applications that support:
  - Claim intake
  - Benefit plan set-up
  - Precertification and authorizations
  - Claim processing and payment
  - Financial and reporting databases
- Upgraded vendor applications for claim editing and clinical bundling.
- Updated business processes and policies to support the new ICD-10 code set.
- Created a cross-organizational task force to oversee code translations for all business process and systems.
- Performed analysis on inpatient hospital diagnosis related group payment impacts.

What testing has been completed?
We have performed internal testing of Cigna systems and conducted external testing with Emdeon, Optum, and Post-n-Track.®. Our testing has included:
- Receipt of ICD-9 and ICD-10 coded test claims
- Confirmation of accept and reject logic based on date of service or discharge
- Routing of claims to all Cigna business units
- Processing and payment of both ICD-9 and ICD-10
- Return of the following 5010 industry standard transactions: 999, 277, and 835
- Remediation of all proprietary inbound and outbound files that contain ICD-9 and ICD-10 codes

We will also continue testing and validation of reporting and analytics processing, including outbound files to clients and vendors through 2014.
Is Cigna evaluating how ICD-10 implementation will affect diagnosis related group inpatient hospital claims?
Yes. We have a diagnosis related group (DRG) inpatient hospital study underway, which will continue through the first quarter of 2015. The study will provide insights on inpatient hospital coding practices and how they affect payment. This collaborative process allows Cigna and the hospital to analyze claims with ICD-9 and ICD-10 coding.

ICD codes
When will Cigna accept ICD-10 codes?
Cigna will not accept ICD-10 codes until the new compliance date. We will continue to accept ICD-9 codes before and after the new compliance date for dates of service or discharge that precede the new compliance date.

Will Cigna's implementation of ICD-10 codes vary by product or platform?
No. All systems will be remediated to support ICD-10 based on standard requirements.

Will Cigna accept unspecified codes?
When sufficient clinical information isn't known or available about a particular health condition to assign a more specific code, it is acceptable to report the appropriate "unspecified" code (e.g., a diagnosis of pneumonia has been determined, but not the specified type).

How is Cigna using the General Equivalency Mappings (GEMs)?
We used the GEMs as a guideline to build our diagnosis and procedure ICD-9 to ICD-10 translation maps. Certified coders and Medical Directors were engaged to review the GEMs to ensure agreement on the mapping, and to be sure all codes were included. These maps were used to update clinical policies, support client reporting, operating procedures, and benefit plans including client specific plans.

Claim processing
When will Cigna begin accepting the revised CMS 1500 paper claim form?
Cigna currently accepts the revised CMS 1500 Health Insurance Claim form (version 2/12). As of October 1, 2014, Cigna will only accept the CMS 1500 form (02/12).

The newest version of the form includes the following information to increase functionality:
- Indicators for differentiating between ICD-9-CM and ICD-10-CM diagnosis codes
- Expansion of the number of possible diagnosis codes to 12
- Qualifiers to identify the following provider roles (on item 17):
  - Ordering
  - Referring
  - Supervising

For additional information about the CMS 1500 claim form and to obtain a copy, please visit the National Uniform Claim Committee (NUCC) website at nucc.org.

Please note that as of March 31, 2014, the Center for Medicare & Medicaid Services (CMS) no longer accepts the CMS 1500 Health Insurance Claim Form (version 08/05). Professional and supplier paper claims are only accepted by CMS on the revised CMS 1500 Health Insurance Claim form (version 2/12).²

¹Although the revised CMS 1500 claim form has functionality for accepting ICD-10 codes, Cigna will not be accepting ICD-10 codes on claims until the new compliance date.

²The Administrative Simplification Act (ASCA) requires that Medicare claims be sent electronically unless certain exceptions are met. Some Medicare providers qualify for these exceptions and send their claims to Medicare on paper. For more information about ASCA exceptions, please contact the Medicare Administrative Contractor (MAC) who processes your claims. Claims sent electronically must abide by the standards adopted under the Health Insurance Portability and Accountability Act of 1996 (HIPAA).
What is Cigna’s approach regarding claim processing?
We will continue to accept electronic and paper claims coded in ICD-9 until the compliance date based on the date of service or discharge. Please be sure you understand how the following claim types will be processed:

- **ICD-10 coded claims**: Claims submitted with dates of-service or discharge on or after the new compliance date will be accepted with ICD-10 codes.
- **Mixed coded claims**: Claims coded with ICD-9 and ICD-10 on the same claim will not be accepted.
- **Claims containing services before and after the compliance date**: These claims require the health care professionals to split the claim so all ICD-9 codes remain on one claim with dates of service prior to the new compliance date and all ICD-10 codes on the claims with dates of service on or after the new compliance date.
- **Inpatient hospital claims**: There is an exception for these claims. These claims should be coded based on the discharge date. Use ICD-9 code if the discharge date is before the new compliance date. Use ICD-10 code if the discharge date is on or after the new compliance date.

Are there any new claim reject codes for ICD-10?
No. We did not add or change any claim reject codes for ICD-10.

Electronic claim submission
We strongly encourage you to submit your claims electronically, as it can help you save time, money, and improve claim processing accuracy. Using one of Cigna’s electronic data interchange (EDI) options allows you to send, view, and track claims with Cigna—no faxing, printing, or mailing. Everything is right on your desktop. For more information about electronic claim submission, refer to information on the Cigna for Health Care Professionals website at CignaforHCP.com > Resources > Clinical Reimbursement Policies and Payment Policies > Claim Policies and Procedures > How to File a Claim).

Clinical Policies
What has Cigna done to support clinical policy updates?
- Our medical and pharmacy clinical policies have been updated to support ICD-10 as part of the standard review process.
- ICD-10 codes have been added to the policies along with the corresponding ICD-9 codes.
- All of our clinical policies are available on our public website, as well as the secure Cigna for Health Care Professionals website (CignaforHCP.com).
- Information about major policy updates is provided to our network of health care professionals in Network News, our quarterly newsletter.

Authorizations
Will there be any changes to authorization or medical necessity approval processes?
No. There will be no changes to our utilization management guidelines or processes for medical necessity approval.

What is Cigna’s approach for authorizations?
- Referral or authorization for date of service or admission prior to or on the new compliance date – only accept ICD-9 codes.
- Referral or authorization for a date of service or admission on or after the new compliance date – only accept ICD-10 codes.
- Cigna will only accept one code type on a referral or authorization based on date of service or admission.

What is Cigna’s approach for referrals and authorizations for services that include dates before and after the compliance date?
If a referral or authorization includes dates before and after the compliance date, only a single referral or authorization will be required to support claim processing.
Questions
If you have questions about ICD-10 implementation, please contact your Cigna representative, or call Customer Service at 1.800.88Cigna (882-4462).