

May 17, 2012

***Submitted Electronically***

Marilyn Tavenner  
Acting Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
200 Independence Avenue, S.W., Room 445-G  
Washington, D.C. 20201

***Re: Administrative Simplification: Change to the Compliance Date for ICD-10-CM and ICD-10-PCS Medical Data Code Sets - CMS 0040 P; Pages 22950 – 23005 FR DOC # 2012-8718***

Dear Ms. Tavenner:

The Florida Hospital Association (FHA), on behalf of its more than 180 hospital and health system members, as well as nearly 1,200 individual members, appreciates the opportunity to offer comments on the Centers for Medicare & Medicaid Services' (CMS) notice of proposed change to the compliance date for implementing the ICD-10 code set. As proposed, CMS would delay the implementation of both the Clinical Modification and Procedure Coding System sections of the ICD-10 code list from October 2013 to October 2014.

The FHA supports the proposed one-year delay in ICD-10 implementation. We also support that both the Clinical Modification and Procedure Coding Systems move forward at the same time, rather than implementing the Procedure Coding System in 2013. The additional year will be advantageous for staff education, training, and analysis.

The American Hospital Association (AHA) conducted a member study to assess ICD-10 readiness and found that, given the many competing initiatives currently underway, including health reform implementation and the adoption of electronic health records, 70 percent of the responding hospitals thought a short delay in ICD-10 adoption would be helpful and allow time to address competing priorities.

We ask that, if CMS adopts the one-year proposed delay in implementation, the compliance date not be further extended at some future time. Asking providers to expend resources on training and system changes and then further extending compliance would impact a provider both from a financial perspective and would necessitate the need for re-training of staff.

Health and Human Services and CMS should use the lessons learned from the implementation of the ASC X12 version 5010 to assist health care providers and payers in implementation and testing of ICD-10. CMS and federal contractors should lead the way in this implementation and testing and be directed to assist providers and health plans to ensure that the time gained from the

implementation delay be used to ensure compliance. CMS must work closely with state Medicaid agencies to secure their compliance with the new coding system.

While we support the October 2014 compliance date for ICD-10, we believe that implementation of the Health Plan Identifier should be delayed until at least October 2015. If the compliance date for the two changes was the same, providers and payers would not be able to clearly identify the reason behind claims processing delays and errors.

Thank you for the opportunity to share our concerns and comments. If you have any questions, please contact me at [kathyr@fha.org](mailto:kathyr@fha.org) or via phone at (407) 841-6230.

Sincerely,

A handwritten signature in cursive script that reads "Kathy Reep".

Kathy Reep  
Vice President/Financial Services