

Insights to Coding and Data Quality

Readiness for ICD-10 includes coding policy/procedure inventory and checklist

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AHIMA-Approved ICD-10-CM/PCS Trainer

As we continue in our readiness for ICD-10 implementation, another area we need to address is coding policies and procedures. In addition to the inventory of physician query forms/and templates, if you have any policies and/or procedures that include the listing, wording, or language of ICD-9-CM codes, they need to be assessed, reviewed and updated if appropriate. You may simply have policies that state “ICD-9-CM” and they now need to state “ICD-10-CM.” Keep in mind that with ICD-9-CM code set, it includes the procedure section; and now with ICD-10, we need to list ICD-10-PCS for the procedure coding system, which is a little different.

Organizational or departmental policies and procedures are essential to compliance. Having up-to-date policies and procedures is often an annual or bi-annual review process, so this may be an easy task for some of you. However, keeping updated policies and procedures is essential to accurate coding activities as well as employee orientation and training. The following sample is a start to tracking the inventory and checklist process similar to the physician query checklist. This is a good tool to use to also indicate and validate that this step to your readiness has been completed.

ICD-10 Coding Policy & Procedure Checklist

#	P&P Name and/or #	Topic/Subject	Date Last Rev'd	P&P Contains ICD-9-CM codes and/or Language (Y/N) (If "NO" do not proceed)	Reviewed for ICD-10? (Y/N)	New ICD-10 Code being Inserted	Date Rev. Completed	Date Rev. Released
1	Coding Education	Required Annual Coding Education	11/2012	NO	NA		NA	NA
2	HIV Code	California reporting of V08 HIV status	11/2012	YES	yes			
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List the “title” or number of your policy; include a column to indicate the topic or subject of the policy; add the date policy was last reviewed; indicate whether there were codes or language related to the ICD-9-CM code set contained within the policy; include columns for the dates of the different steps as well as the “new revised” language or wording that is recommended for the policy/procedure form. Again, do not forget that ICD- 10 has two code sets now; ICD-10-CM for diagnosis and ICD-10-PCS for the procedure coding system, thus your policies should be worded correctly.

We know that ICD-10-CM has some specific code subcategory expansion and these are areas to consider for new policy and procedure documents.

If your readiness plan does not include the inventory, review, and revisions to coding policies and procedures, it should, so discuss this with your committee or subgroup for ICD-10. Talk to your compliance director or officer also. Your ICD-10 readiness along with confirmation for your compliance leadership should include the inventory checklist as validation. Being proactive and organized with easy to use inventory tools will make the final months easier to manage. The full Word document for the Coding Policy/Procedure Inventory Check list is posted below.

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