NCVHS Panel 3:

ICD-10 Implementation Beyond Covered Entities

Presented by: Robert A Holden

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AMERICAN ASSOCIATION OF PAYERS, ADMINISTRATORS AND NETWORKS

American Association of Payers Administrators and Networks (AAPAN)

Composed of two organizations whose members provide services to covered and non-covered entities:

- **Association of Preferred Provider Organizations (AAPPO)**
- **Third Party Administrators Association of America (TPAAA)**

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Recommendations:

1. **States should be encouraged to assess the impact of ICD-10 implementation on non-covered entities during planning and incorporate guidelines for compliance**

2. **State regulatory implementation should be as transparent as possible and incorporate stakeholders from non-covered entities**

3. **HHS should provide guidance to the states for planning and for outreach so that implementation can proceed efficiently**

State and Federal Reform Efforts Place New Requirements on TPAs

Affordable Care Act Implementation

Stop-loss insurance regulation on self-insured plans:

- Rejected at the national level
- Individual states considered for adverse selection

TPA Administered Contraceptive Coverage

- Compliance requirements
- No market certainty

State Implementation of ICD-10 Standards

- **States increasingly blend Group Health and Workers Compensation Regulatory Models**
- **AAPAN members offer services to covered and non-covered services**
- **Dual Reporting for Workers' Compensation Administrators and Provider Costs**

Member Surveys Assessing ICD-10 Readiness

50% identified themselves as regional coverage

40% provided national coverage

All respondents were either very familiar (71.4%) or somewhat familiar (28.6%) with ICD-10 requirements

- **50% had already completed their own planning process.**
- **35.7% uncertain of their states' positions**
- **28% concerned trade partners would not be ready.**

Conclusions:

1. **Remaining time should be spent assuring state planning and guidelines for compliance**

2. **Implementation should be as transparent and incorporate non-covered entity stakeholders**

3. **HHS should provide guidance to the states for planning and outreach**