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Ross Lippincott, VP Regulatory Implementation Office A Case Study on Implementing ICD-10: Challenges and Lessons Learned

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✓ Code Mapping and Configuration

✓ Testing

- ✓ Operational Readiness
- ✓ Training/Communications/Provider Readiness

✓ Business Continuity Risk

WHAT'S LEFT FOR UHG?

- ✓ Load Codes to Test Environments (now March)
- ✓ Load Codes to Production (April August)
- ✓ Operational Readiness Impact Assessments (Feb July)

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- ✓ Internal Compliance and Neutrality Testing (now Sept)
- Reconciliation Testing (April Sept)
- ✓ Business Partner Testing (April Sept)



Code Mapping

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Code Mapping



Enhanced GEMS with missing codes

- ✓ Created "forced mapping" from 10 to 9
- ✓ Literally millions of mapped codes to review
- ✓ Challenges with code ranges

Lesson Learned:

✓ Start early

- ✓ Don't under estimate effort
- ✓ Hire sufficient coding resources to conduct review



Testing

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ICD-10 Business Testing Status

✓ Completed Internal Test plans for execution.

- ✓ Over 14,000 test cases across all platforms.
- Tracked & managed completion of nearly 20,000 business owned UAT scenarios.

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- Defined Test Strategy to support Financial and Operational Neutrality.
- ✓ Completed DRG Reimbursement Shift Analysis.
- ✓ Defined Program Business Partner Test Strategy.

External Partner Testing A Multi-Phase Approach

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- Collaborating with selected external providers to follow a multi-phased test approach.
- Identify and mitigate a unique dimension of ICD-10 business risk.
- Findings and recommendations will be shared via provider portals, other communication channels.

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DRG Comparison & Revenue Shift Analysis (9/2012 – 12/2013)

Test Claim

Processing

(3/2014 - 9/2014)

- Partnership with providers to identify, evaluate and predict the impact of coding conditions that may generate an ICD-9 to ICD-10 DRG shift.
- UHC extracts a selection of adjudicated claims that include frequently used ICD-9 codes, and the hospital uses medical records to natively re-code claims in ICD-10.
- UHC will process a small volume of ICD-10 coded test claims through claim platforms with additional selected Facility and Medical providers.
 - This test phase allows providers to practice coding ICD-10 claims and to evaluate payment results for selected diagnosis and procedure codes.

"End-to-End" Claim Process Flow Testing (4/2014 – 9/2014) End-to-end testing is designed to replicate the production flow of ICD-10 test claims from select providers through clearinghouses and payer claim systems to verify provider, vendor, clearinghouse and payer system readiness and claim results.

External Partner Testing What Have We Learned?

✓ In June 2013, UHC wrapped up DRG shift testing with the first set of facilities.

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✓ Initial test produced a DRG shift for over 7% of claims.

✓ Final results indicated 0.5% valid shift in DRGs when compared to ICD-9 paid claims.

Lesson Learned:

 Correctly coded claims will pay the same with ICD10 codes (or extremely close)

✓ Incorrectly coded claims have a risk of paying incorrectly

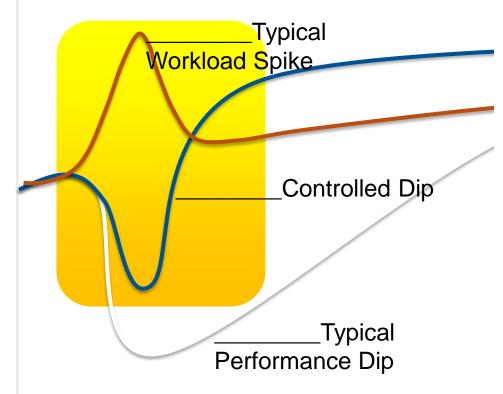


Operational Readiness

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ICD-10 Operational Readiness Assumptions

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Workloads Most Likely Impacted

Workloads directly related to brokers/ employers, claims/appeals/grievances, payment integrity, constituent services/call centers, state government transitions, provider experience, clinical case complexity.

General Workload Estimations

- Spike will start 1-2 weeks after deployment.
- Workloads will increase 5-10% during spike.
- Spike will last ~6 months, with a decline during months 3-6 after deployment.
- By Sept 2015 workloads will level off with an overall increase of 1-3% compared to pre-deployment ("new normal").

ICD-10 Operational Readiness

✓ Using these assumptions, estimated impact to business operations in support of ICD-10 production deployment at UHG.

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✓ Hiring underway for these positions.

✓ Conducting Operational Impact Assessments

Confirmed impacted (and not impacted) processes
Example : pre-authorizations not impacted

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Training and Communications Provider Readiness

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ICD-10 Training and Communications



Training

- Code Set Specific Training : 3,000+ UHG employees that are certified medical coders.
- ICD-10 Operational Training : Available to employees in 2014
- Code Look Up Tool : ICD-9 to ICD-10 UHG mapping.

Communications

- State Communications
- FAQs
- Video Awareness Series "There's a Code for That?"

There's a There? Code for There?









Y93.G2Injury while grillingY92.017Yard in single family house as the place of occurrenceS00.12xABlack eye, left eye

Link: Frontier > Corporate Departments > Regulatory Implementation Office

Communication Outreach

Robust Provider Communications & Outreach Activities

Face-to-Face Provider Outreach & Town Halls

37 States – 18 months – 10,000+ providers

Public Outreach Internet site

Targeted for Providers Free Training Materials Industry Information

- General Mailbox for ICD-10 Questions
 - icd10questions@uhc.com
- Extensive Provider Advocacy Network
- Educational Webinars
- Active Industry Collaboration
- Focus on Clinical Documentation Initiative programs as far in advance of the deadline as possible
- Documentation is key
- Documentation can be improved immediately, and benefits would be recognized even in the current ICD-9 world
- Recently deployed code mapping tool based on UHG crosswalk







Vendor Readiness

- ✓ Must communicate with vendors
- ✓ Keep pressure on regarding delivery dates
- ✓ Must deliver not just promise
- Consider replacing vendor if <u>reasonable</u> delivery date can't be confirmed
- ✓ If not <u>delivered</u> by 3/31/14, provider at high risk for meeting compliance date (implementation, configuration, testing could take several months)



Business Continuity Risk (aka "Contingency Planning")

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ICD-10 Business Continuity Risk

Contingency Planning

Critical risk scenarios requiring contingency options:

- Small Providers aren't ready (if hundreds, what is the correct response?)
- ✓ Large Facilities aren't ready (what is the impact to members/patients?)
- ✓ State Medicaids aren't ready (is rejecting claims truly an option?)

Health Plans are not in alignment on response strategies

- Some plans taking the compliance approach: non-compliant transactions will not be processed
- Some plans are looking for flexible alternatives (dual processing) but have legitimate concerns (COB / secondary payer, CMS reporting, system constraints, etc)
- Some plans (and clearinghouses) have suggested crosswalking but must address the inherent problems this brings (legal risks, etc.)

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ICD-10 Business Continuity Risk

What Can Be Realistically Expected / Planned For?

✓ Push the date? Does not address the core issue unless paired with Action Plans that lagging organizations can be held to. Would negatively impact "ready" organizations.

✓ Dual Processing? CMS and other payers have not implemented system changes and data configuration required to support this option. Insufficient time to address at this point.

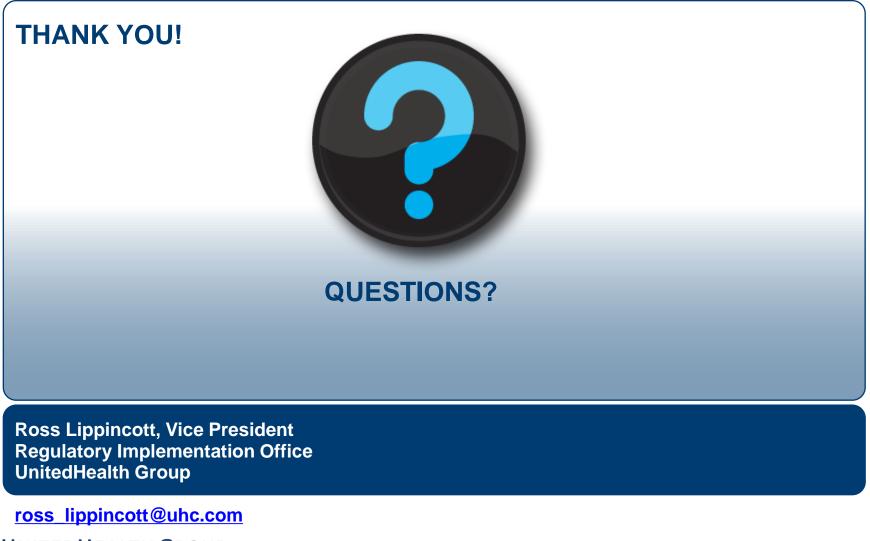
✓ Other options?

ICD-10 Business Continuity Risk

UHG Contingency Planning

- Enter claims via UHG portal
- ✓ Submit via paper
- ✓ CMS free eBilling software
- ✓ No new claim edits
- ✓ No new "specificity" edits
- ✓ No new edits for additional documentation

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