

IMPLEMENTATION TIMELINES AND OVERLAPS

5010, ICD-10, HITECH, AND PPACA

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IN THE BEGINNING

Updated HIPAA standards

Regulation published Jan 16, 2009

Implementation date Jan 1, 2012

WEDI Timeline:

- **Reasonable approach to implementation**
- **Followed CMS recommendations for testing in 2011**
- **Assumed entities would start upon publication of regulation**

NCHICA/WEDI TIMELINE

HIPAA X12 Modifications Timeline Feb 5, 2009						
ID	Start	Finish	Task Name	Predecessors	Duration	
1	Fri 8/22/08	Fri 8/22/08	NPRM Published		0 days	
2	Fri 1/16/09	Fri 1/16/09	Final Rule Published		0 days?	
3	Fri 1/16/09	Sun 1/1/12	Industry Development and Implementation		772 days	
4	Fri 1/16/09	Sun 1/1/12	Vendor Development & Implementation (includes clearinghou		772 days	
5	Fri 1/16/09	Sun 2/15/09	Analyze impact of changes from NPRM to Final Rule	2	30 edays	
6	Sun 2/15/09	Thu 4/16/09	Define product requirements, cost analysis, risk analysis	5	60 edays	
7	Thu 4/16/09	Sat 5/16/09	Requirements engineering, risk management, product plans	6	30 edays	
8	Sat 5/16/09	Thu 11/12/09	Solution development	7	6 emons	
9	Wed 7/15/09	Mon 1/11/10	Verification/validation	8SS+60 edays	6 emons	
10	Mon 1/11/10	Sun 4/11/10	Customer beta test and review	9	3 emons	
11	Sun 4/11/10	Thu 1/6/11	Customer product rollout	10	9 emons	
12	Sun 4/11/10	Sun 1/1/12	Customer Support	59FF	451 days	
13	Fri 1/16/09	Thu 1/6/11	Health Plan Development and Implementation		515 days	
14	Fri 1/16/09	Sun 2/15/09	Analysis of Final Rule	2	30 edays	
15	Sun 2/15/09	Mon 6/15/09	Determination of Changes Needed		85 days	
16	Sun 2/15/09	Thu 4/16/09	Business Process Changes	14	2 emons	
17	Thu 4/16/09	Mon 6/15/09	Vendor support needs	16	2 emons	
18	Thu 4/16/09	Mon 6/15/09	Internal hardware and software	16	2 emons	
19	Thu 4/16/09	Mon 6/15/09	Key stakeholder impacts	16	2 emons	
20	Mon 6/15/09	Thu 7/30/09	Develop implementation project plan, including communicac	19	45 edays	
21	Thu 7/30/09	Wed 10/28/09	Refine budget and secure additional funding if necessary	20	90 edays	
22	Thu 7/30/09	Sat 1/1/11	Internal Software development & Deployment (not vendo		373 days	
23	Thu 7/30/09	Mon 4/26/10	Software development	20	9 emons	
24	Wed 10/28/09	Mon 4/26/10	Internal Testing	23SS+90 edays	180 edays	
25	Mon 4/26/10	Sun 7/25/10	External Beta Testing & revisions based on testing	24	90 edays	
26	Sat 8/29/09	Wed 12/22/10	Communication to Partners	23SS+30 edays	16 emons	
27	Sun 7/25/10	Sat 1/1/11	Limited Production	25	5.33 emons	
28	Sun 4/11/10	Thu 1/6/11	Vendor product deployment (vendor dependent plan)		194 days	
29	Sun 4/11/10	Tue 12/7/10	Installation and testing	11SS	8 emons	
30	Thu 6/10/10	Thu 1/6/11	Communication to Partners	29FS-6 emons	7 emons	
31	Tue 12/7/10	Thu 1/6/11	Limited Production	29	1 emon	
32	Fri 1/16/09	Sun 1/1/12	Provider Development and Implementation		772 days	
33	Fri 1/16/09	Sun 2/15/09	Analysis of Final Rule	2	30 edays	
34	Sun 2/15/09	Sun 1/1/12	Education and Staff training	33	35 emons	
35	Sun 2/15/09	Mon 6/15/09	Determination of Changes Needed		85 days	
36	Sun 2/15/09	Thu 4/16/09	Business Process Changes	33	2 emons	
37	Thu 4/16/09	Mon 6/15/09	Vendor support needs	36	2 emons	
38	Thu 4/16/09	Mon 6/15/09	Internal hardware and software requirements	36	2 emons	
39	Thu 4/16/09	Mon 6/15/09	Key stakeholder impacts	36	2 emons	
40	Mon 6/15/09	Thu 7/30/09	Develop implementation project plan, including communicac	39	45 edays	
41	Thu 7/30/09	Wed 10/28/09	Refine budget and secure additional funding if necessary	40	90 edays	
42	Thu 7/30/09	Thu 1/6/11	Internal Software development & Deployment (not vendo		376 days	
43	Thu 7/30/09	Mon 4/26/10	Software development	40	9 emons	
44	Wed 10/28/09	Mon 4/26/10	Internal Testing	43SS+90 edays	180 edays	
45	Mon 4/26/10	Sun 7/25/10	External Beta Testing & revisions based on testing	44	90 edays	
46	Thu 2/25/10	Thu 1/6/11	Communication to Partners	44FS-2 emons	10.5 emons	

TIMELINE

HIPAA X12 Modifications Timeline Feb 5, 2009						
ID	Start	Finish	Task Name	Predecessors	Duration	
47	Sun 7/25/10	Sat 1/1/11	Limited Production	45	5.33 emons	
48	Sun 4/11/10	Thu 1/6/11	Vendor product deployment (vendor dependent provider)		194 days	
49	Sun 4/11/10	Tue 12/7/10	Installation and testing	11SS	8 emons	
50	Thu 6/10/10	Thu 1/6/11	Communication to Partners	49FS-6 emons	7 emons	
51	Tue 12/7/10	Thu 1/6/11	Limited Production	49	1 emon	
52	Thu 1/6/11	Sun 1/1/12	Transition Phase		257 days	
53	Thu 1/6/11	Sun 1/1/12	Plans		257 days	
54	Thu 1/6/11	Sun 1/1/12	Transition to New Standards	27,31	12 emons	
55	Mon 10/3/11	Sun 1/1/12	Phase out prior standard support	54SS+9 emons	3 emons	
56	Thu 1/6/11	Sun 1/1/12	Providers		257 days	
57	Thu 1/6/11	Sun 1/1/12	Transition to New Standards	47,51	12 emons	
58	Mon 10/3/11	Sun 1/1/12	Phase out prior standard support	57SS+9 emons	3 emons	
59	Sun 1/1/12	Sun 1/1/12	Full Compliance	55,58	0 edays	
60	Fri 1/16/09	Sun 1/1/12	Implementation Monitoring		36 emons	

ICD-10 REQUIREMENTS

Regulation published Jan 16, 2009

Implementation Date (services on and after) Oct 1, 2013

Another WEDI Timeline Created

- **Reasonable project plan**
- **Attempt to meet the required implementation date**
- **Some contention for resources**

ICD-10 TIMELINE

ICD-10 Timeline with Comments as of July 15, 2009						
ID	Task Name	Duration	Start	Finish	Predecessors	
1	Vendor Tasks	1520.94 days	Fri 1/16/09	Sun 11/16/14		
2	Primary/Mainframe Vendor Tasks	1096 days	Fri 1/16/09	Mon 11/29/12		
3	Identify staff to receive training	3 emons	Fri 1/16/09	Thu 4/16/09		
4	Produce Training Material	5 emons	Fri 1/16/09	Mon 6/15/09		
5	Establish Organizational Implementation Structure	6 emons	Fri 1/16/09	Wed 7/15/09		
6	Determine Product Requirements	8 emons	Fri 1/16/09	Sun 9/13/09		
7	Estimate Budgets	8 emons	Fri 1/16/09	Sun 9/13/09		
8	Product reengineering analysis	6 emons	Sun 9/13/09	Fri 3/12/10	7	
9	Product/Solution Development	9 emons	Fri 3/12/10	Tue 12/7/10	8	
10	Product Testing/Validation/Verification	6 emons	Tue 12/7/10	Sun 6/5/11	9	
11	Customer Review and Beta Testing	6 emons	Sun 6/5/11	Fri 1/22/11	10	
12	Installation and Testing	12 emons	Fri 1/22/11	Mon 11/26/12	11	
13	Customer Support	36 emons	Fri 1/22/11	Sun 11/16/14	11	
14	Secondary Vendor Tasks	1076.94 days	Fri 1/16/09	Sun 2/24/13		
15	Identify staff to receive training	3 emons	Fri 1/16/09	Thu 4/16/09		
16	Produce Training Material	5 emons	Fri 1/16/09	Mon 6/15/09		
17	Establish Organizational Implementation Structure	6 emons	Fri 1/16/09	Wed 7/15/09		
18	Determine Product Requirements	6 emons	Fri 1/16/09	Wed 7/15/09		
19	Estimate Budgets	6 emons	Fri 1/16/09	Wed 7/15/09		
20	Product reengineering analysis	3 emons	Wed 7/15/09	Tue 10/13/09	18	
21	Product/Solution Development	6 emons	Tue 10/13/09	Sun 4/11/10	20	
22	Product Testing/Validation/Verification	6 emons	Sun 4/11/10	Fri 10/8/10	21	
23	Customer Review and Beta Testing	6 emons	Fri 1/22/11	Wed 5/30/12	11	
24	Installation and Testing	9 emons	Wed 5/30/12	Sun 2/24/13	23	
25	Customer Support	24 emons	Wed 5/30/12	Tue 5/20/14	23	
26						
27						
28	Health Plan Tasks	1285.94 days?	Fri 1/16/09	Sat 12/21/13		
29	Planning	128 days	Fri 1/16/09	Wed 7/15/09		
29	High-level planning for ICD-10 activities	6 emons	Fri 1/16/09	Wed 7/15/09		
30	Awareness, Communication, & Education/Training	1285.94 days	Fri 1/16/09	Sat 12/21/13		
31	Provide awareness training to core group and Senior Management	3 emons	Fri 1/16/09	Thu 4/16/09		
32	Staff Education/Training and Participation in Industry Work	60 emons	Fri 1/16/09	Sat 12/21/13		
33	Partner Communications	60 emons	Fri 1/16/09	Sat 12/21/13		
34	Develop Tools / Processes to facilitate assessment activities	9 emons	Thu 4/16/09	Mon 1/11/10		
35	Perform Impact Assessment	128 days?	Fri 1/16/09	Wed 7/15/09		
36	Identify impacted business areas	6 emons	Fri 1/16/09	Wed 7/15/09		
37	Identify impacted systems	6 emons	Fri 1/16/09	Wed 7/15/09		
38	Identify impacts on trading partners	3 emons?	Thu 4/16/09	Wed 7/15/09	37FF	
39	Review cost benefit analyses	1 emon	Mon 6/15/09	Wed 7/15/09	37FF	
40	Validate CMS and NCHS GEMs	1.5 emons	Sun 5/31/09	Wed 7/15/09	37FF	
41	Develop Implementation Strategy/Plan	266 days	Wed 7/15/09	Thu 7/22/10		
42	Implementation Program and Governance Structure Set-up	1 emon	Wed 7/15/09	Fri 8/14/09	40	
43	Business Strategy	6 emons	Fri 8/14/09	Wed 2/10/10	42	
44	Technical Strategy By System	6 emons	Thu 1/12/09	Thu 7/22/10		43SS+3 emons
45	Define and validate Conversion & Migration Strategy and Approach	6 emons	Fri 8/14/09	Wed 2/10/10		
46	Secure budget for implementation	3 emons	Mon 1/18/10	Sun 4/18/10		
47	Kickoff and engage Implementation Teams	3 emons	Mon 1/18/10	Sun 4/18/10		
48	Implementation	966 days	Mon 1/18/10	Tue 10/1/13		
49	Detailed implementation planning for ICD-10 activities	3 emons	Mon 1/18/10	Sun 4/18/10		
50	Prepare Business Functional Requirements	6 emons	Wed 2/10/10	Mon 8/9/10	43	
51	Business Design and Development	9 emons	Mon 8/9/10	Fri 5/6/11	50	
52	System Design and Development	18 emons	Thu 7/22/10	Fri 1/13/12	44	
53	Remediation of Provider Contracts	18 emons	Fri 1/13/12	Sat 7/6/13	52	
54	Internal Testing (internally developed systems)	9 emons	Fri 1/13/12	Tue 10/9/12	52	
55	Vendor Code Deployment and Internal Testing	12 emons	Fri 1/22/11	Mon 1/26/12	11	
56	External Partner testing	10 emons	Mon 1/26/12	Sun 9/22/13	54,55	
57	System Implementation	9 edays	Sun 9/22/13	Tue 10/1/13	56	
58	ICD-10 Compliance Date	0 days	Tue 10/1/13	Tue 10/1/13		
59						
60	Provider Tasks	1285.94 days?	Fri 1/16/09	Sat 12/21/13		
61	Partner Communications	60 emons	Fri 1/16/09	Sat 12/21/13		
62	Organize implementation effort	256 days	Fri 1/16/09	Mon 1/11/10		
63	Briefing and buy in	2 emons	Fri 1/16/09	Tue 3/17/09		
64	Develop preliminary impact analysis and implementation plan	9 emons	Fri 1/16/09	Tue 10/13/09		
65	Organize Cross functional effort	12 emons	Fri 1/16/09	Mon 1/11/10		
66	Estimate budgets	2 emons	Tue 10/13/09	Sat 12/12/09	64	
67	Develop implementation plan	3 emons	Tue 10/13/09	Mon 1/11/10	64	
68	Do Impact assessment	9 emons	Mon 1/11/10	Fri 10/8/10	67	
69	Contact System Vendors	2 emons	Mon 1/11/10	Fri 3/12/10	67	
70	Identify and Implement Process Improvements	36 emons	Tue 10/13/09	Thu 9/27/12	64	
71	Internal System Design/Development	14 emons	Fri 10/8/10	Fri 12/2/11	68	
72	Internal Testing	12 emons	Fri 12/2/11	Mon 11/26/12	71	
73	Vendor Code Deployment	12 emons	Fri 12/2/11	Mon 11/26/12	11	
74	External Testing	10 emons	Mon 11/26/12	Sun 9/22/13	73,72	
75	Implementation	9 edays	Sun 9/22/13	Tue 10/1/13	74	
76	Compliance Date	0 days?	Tue 10/1/13	Tue 10/1/13	75	

TIMELINE LOGIC

Vendors need to go first

- **Analysis**
- **Product development**
- **Internal Testing**
- **Customer beta testing**
- **Customer installation**
 - Can't do all customers at once

TIMELINE LOGIC

Plans and Providers follow

- **Need to do analysis and determine needs**
- **Business analysis key**
- **Need to work with vendors on installation and testing**
- **Must do internal and external (partner) testing**

5010 AND ICD-10 ARE DIFFERENT

- **More substantial business process analysis and development for ICD-10**
- **More training is needed**
- **Testing must be end-to-end to determine how well systems are working**
- **Hard to predict “answer” and end result of claims processing in ICD-10**

WHERE SHOULD WE BE TODAY?

As of Sept 1, 2010:

Vendors:

- **5010** – In product rollout to customers
- **ICD-10** –
 - Primary vendors, product development
 - Secondary vendors, product testing

Health Plans:

- **5010**
 - If vendor dependent, installation and testing
 - If not, should be in limited production

WHERE SHOULD WE BE TODAY?

Health Plans

- **ICD-10 – Business and system design and development**

Providers

•5010

- If vendor dependent, installation and testing
- If not, should be in limited production

- **ICD-10 – Finishing impact assessment**

WHERE SHOULD WE BE TODAY?

Remember that this assumes that previous steps have been taken

- **5010 analysis, assessments, etc.**
- **ICD-10 awareness, business requirements, etc.**

THEN, HITECH AND MEANINGFUL USE

Final rules published July 28, 2010

Stage 1 – 2011

Stage 2 – 2013

Stage 3 – 2015

Remember from timelines that vendors need to prepare and then install with customers.

THEN PPACA

Operating Rules -

- Claims status and eligibility – adopted by July 2011, effective by Jan 1, 2013 (overlap with 5010 and ICD-10)
- Remittance advice and EFT - adopted by July 2012 and effective by January 1, 2014
- Other transactions - adopted not later than July 1, 2014, and effective not later than January 1, 2016.

PPACA

Standards and Operating Rules for Unique Health Plan Identifier, EFT, and Attachments

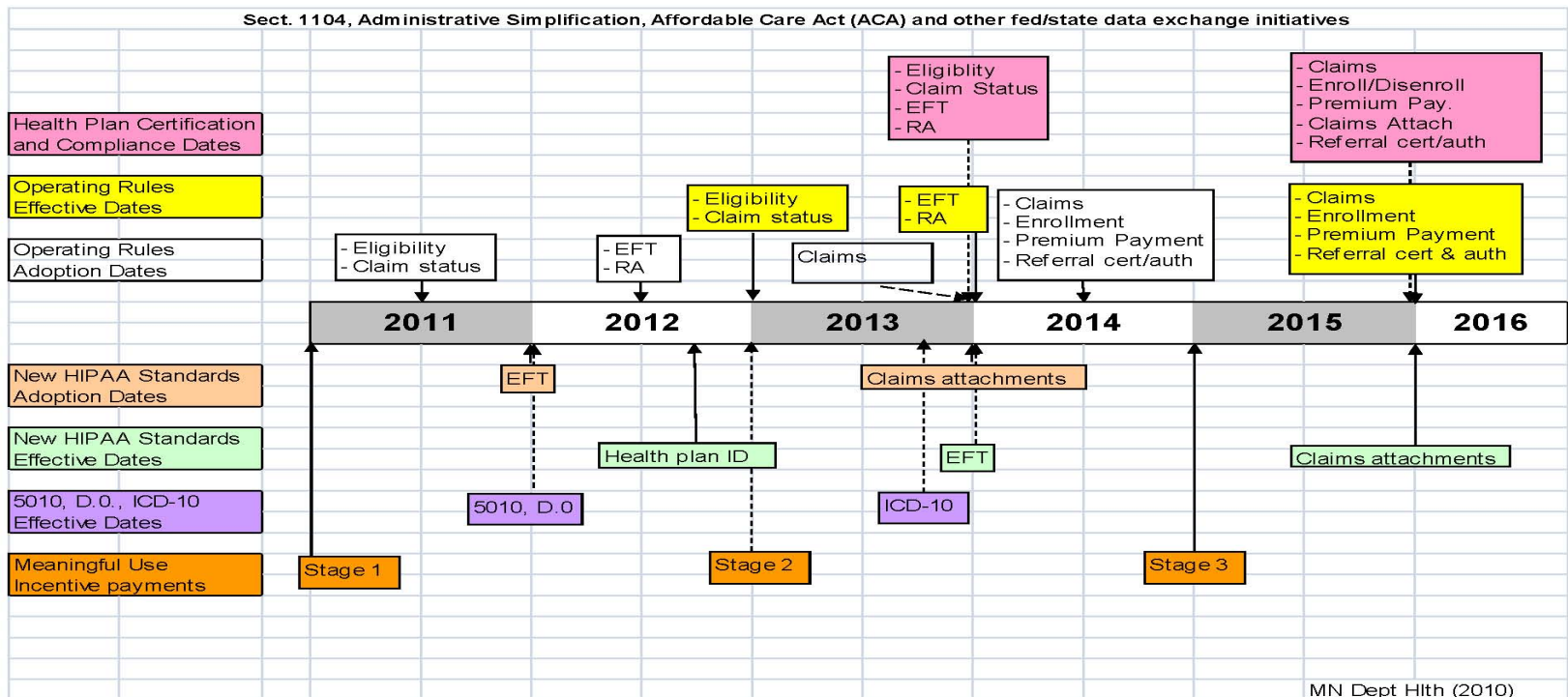
- HPI – effective by 1/1/2012
- EFT – adopted 1/1/2012 and effective 1/1/2014
- Attachments – adopted 1/1/2014 and effective 1/1/2016

PPACA

Periodic Revisions to Standards

- **Review committee (which may be NCVHS) to be established by Jan 1, 2014**
- **Beginning April 1, 2014, and no less than every two years, committee will hold hearings to review the standards and operating rules and recommend changes.**
- **Recommended changes must be adopted via IFR within 90 days of the committee report**
- **Industry has 27 months to implement (close of 60 day comment period + 25 months).**

WHAT DOES IT ALL LOOK LIKE?



OTHER REQUIREMENTS

Note that these are the “EDI” and “HIT” Requirements

Other issues:

- **Health care reform**
- **Privacy and Security**
- **HIPAA Enforcement**
- **Quality improvements**
- **State HIE’s**

IMPLICATIONS

- **Prioritization**
- **Resource overlaps**
- **What are the overlaps among the projects?**
 - EHR/ICD-10
 - 5010/Health Plan ID
- **Requires overall strategic planning and management**

QUESTIONS?

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