

June 15, 2015

The Honorable Diane Black
United States House of Representatives
1131 Longworth House Office Building
Washington, DC 20515

Dear Representative Black:

I am writing on behalf of the American Association of Hip and Knee Surgeons (“AAHKS”) to express our support for H. R. 2247, the “Increasing Clarity for Doctors by Transitioning Effectively Now Act” (“ICD-TEN Act”).

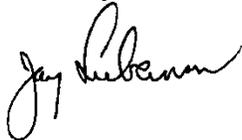
AAHKS is the essential organization of more than 2500 hip and knee specialists, functioning to serve the needs of patients, care providers and policy makers regarding hip and knee health, including hip and knee replacement surgery. AAHKS’s mission is to advance and improve hip and knee patient care through leadership in education, advocacy and research.

Our members share your interest in ensuring a smooth transition to the new ICD-10 coding system. As you know, this transition will be especially challenging for physician practices given the exponential increase in the number of codes and the complexity of the sub-coding framework. We are very concerned that despite significant physician investment in preparing for ICD-10, the system may not yet be fully functional. As a result, physicians still may face claims processing delays, claims rejections, and even penalties as technical issues are resolved and coders learn the intricacies of the new system. Such disruptions pose a particular hardship for small practices and ultimately could negatively impact patient access to care.

That is why it is so important for Congress to ensure that CMS conducts full end-to-end testing and certifies that the Medicare ICD-10 claims processing system is fully functioning (98% threshold) before implementation. We also agree that a safe harbor transitional period of at least 18 months should be established during which no Medicare claim will be denied due solely to the use of an unspecified or inaccurate subcode.

Again, we appreciate your efforts to ensure that ICD-10 implementation does not further disrupt physician practices or interfere with patient care.

Sincerely,



Jay R. Lieberman, MD
President
AAHKS

Cc:

Rep. Andy Harris [R-MD-1]
Rep. David P. Roe [R-TN-1]
Rep. Larry Bucshon [R-IN-8]
Rep. David B. McKinley [R-WV-1]
Rep. Steve Womack [R-AR-3]
Rep. Brian Babin [R-TX-36]
Rep. Tom Price [R-GA-6]