

September 19, 2006

The Honorable Bill Frist
Majority Leader
United States Senate
230 United States Capitol
Washington, DC 20510

**Letter also sent to Sens. Baucus, Clinton, Enzi,
Grassley & Kennedy and Reps. Barton, Brown,
Deal, Dingell, N. Johnson, Rangel, Stark,
& Thomas**

Dear Majority Leader Frist:

The undersigned physician and state medical associations are concerned with the feasibility of a rapid transition from ICD-9 to ICD-10. Recent action at the AMA House of Delegates called for “delayed implementation of a simplified, modified ICD-10-CM coding system which is less burdensome on practicing physicians, hospitals, and the health insurance industry.” We therefore urge that provisions requiring implementation by a date certain, or at least prior to 2012, not be included in a conference report promoting health information technology.

In addition to the costs and challenges associated with implementing new clinical information technology systems, physician offices could face the equally costly prospect of upgrading or replacing practice management systems for billing and coding and the necessity of retraining their billing and coding staff. Private payers and others, including the federal government, would also have to upgrade their own payment processing and data management systems to accommodate the significantly larger body of data generated by the transition.

Additionally, the next generation of HIPAA electronic transactions (ANSI X12 version 5010) has yet to be put into place. The Workgroup for Electronic Data Interchange, an HHS advisory group, has said that version 5010 is a pre-requisite to ICD-10 and cannot be implemented at the same time.

Despite the complexity and cost of developing a national health information network, physicians are optimistic about the transformative power that adoption of this technology promises for the future of patient care. We look forward to continuing our work together to achieve this goal.

Sincerely,

American Academy of Dermatology Association
American Academy of Facial, Plastic and Reconstructive Surgery
American Academy of Family Physicians
American Academy of Ophthalmology
American Academy of Otolaryngology-Head and Neck Surgery
American Association of Clinical Endocrinologists
American Association of Clinical Urologists
American Association of Neurological Surgeons

American Association of Orthopaedic Surgeons
American College of Chest Physicians
American College of Emergency Physicians
American College of Gastroenterology
American College of Osteopathic Internists
American College of Osteopathic Surgeons
American College of Rheumatology
American College of Surgeons
American Gastroenterological Association
American Geriatrics Society
American Medical Association
American Medical Directors Association
American Osteopathic Academy of Orthopedics
American Osteopathic Association
American Society for Clinical Pathology
American Society for Gastrointestinal Endoscopy
American Society of Anesthesiologists
American Society of Cataract and Refractive Surgery
American Society of Plastic Surgeons
American Thoracic Society
American Urological Association
College of American Pathologists
Congress of Neurological Surgeons
Heart Rhythm Society
Infectious Diseases Society of America
Medical Group Management Association
National Hispanic Medical Association
Society for Cardiovascular Angiography and Interventions
Society for Vascular Surgery
Society of Gynecologic Oncologists
Society of Interventional Radiology
Medical Association of the State of Alabama
Alaska State Medical Association
Arizona Medical Association
Arkansas Medical Society
California Medical Association
Medical Society of Delaware
Medical Society of the District of Columbia
Florida Medical Association
Medical Association of Georgia
Idaho Medical Association
Illinois State Medical Society
Iowa Medical Society
Kansas Medical Society
Louisiana State Medical Society
Maine Medical Association

MedChi, the Maryland State Medical Society
Massachusetts Medical Society
Michigan State Medical Society
Minnesota Medical Association
Mississippi State Medical Association
Montana Medical Association
Nebraska Medical Association
Nevada State Medical Association
New Hampshire Medical Society
Medical Society of New Jersey
New Mexico Medical Society
Medical Society of the State of New York
North Carolina Medical Society
Ohio State Medical Association
Oregon Medical Association
South Carolina Medical Association
Tennessee Medical Association
Texas Medical Association
Utah Medical Association
Vermont Medical Society
Medical Society of Virginia
Washington State Medical Association
West Virginia State Medical Association
Wisconsin Medical Society
Wyoming Medical Society