

October 28, 2010

The Honorable Secretary Sebelius
U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 509F
200 Independence Avenue, SW
Washington, DC 20201

Dear Secretary Sebelius:

We, the undersigned organizations, encourage you to institute a national testing period in 2011 for Version 5010 of the Health Insurance Portability and Accountability Act (HIPAA) electronic transactions. We are concerned that without this designated testing period many HIPAA covered entities will not be ready to conduct Version 5010 transactions by the January 1, 2012, compliance deadline, which will result in significant disruptions to claims processing and payments.

Moving to Version 5010 will be a very challenging transition for health care providers, especially for smaller practices. In order to meet the January 1, 2012, deadline health care providers must rely on the compliance of multiple partners including: practice management system (PMS) vendors to provide timely upgrades to software and billing systems; clearinghouses' ability to move to Version 5010 on time; and health plans' conversion from Version 4010 to 5010. All of these actions must take place well in advance of the January 1, 2012, compliance date to avoid delays in the payment of claims. Just as the health care industry experienced with the transition to Version 4010 of the electronic transactions and the conversion to the National Provider Identifier (NPI), testing of systems and transmission protocols in advance of a compliance deadline are critical for deterring claims payment disruptions.

Designating a national testing period in advance of the compliance date will focus the industry's attention to prepare internal systems for the move to Version 5010 and begin testing electronic transactions with trading partners. Having the Centers for Medicare & Medicaid Services (CMS) participate in Medicare system testing would further support the importance of this activity. We believe that the optimum national testing period should be June 6 through June 10, 2011, so that external testing takes place six months prior to the January 1, 2012, compliance date. This period would permit sufficient time for trading partners to correct any problems that are discovered during the testing process.

We commend CMS for proactively engaging health care providers and for participating in multi-stakeholder efforts to move the industry towards adoption of Version 5010 and ICD-10. We are hopeful that with appropriate education and sufficient testing in advance of the compliance deadline, the transition to Version 5010 will be a streamlined process and disruptions to the claims payment process will be minimal. We look forward to working with you as the implementation of Version 5010 continues. If you have any questions, please contact Mari Savickis at 202.789.7414 or mari.savickis@ama-assn.org or Robert Tennant at 202.293.3450 or rtennant@mgma.org.

Sincerely,

American Academy of Dermatology Association
American Academy of Ophthalmology
American Academy of Otolaryngology—Head and Neck Surgery
American Academy of Physical Medicine and Rehabilitation
American Association of Clinical Endocrinologists

American Association of Orthopaedic Surgeons
American College of Cardiology
American College of Emergency Physicians
American College of Gastroenterology
American College of Obstetricians and Gynecologists
American College of Osteopathic Surgeons
American College of Physicians
American College of Radiation Oncology
American College of Radiology
American College of Rheumatology
American College of Surgeons
American Gastroenterological Association
American Geriatrics Society
American Medical Association
American Osteopathic Academy of Orthopedics
American Psychiatric Association
American Society for Gastrointestinal Endoscopy
American Society of Plastic Surgeons
American Society of Hematology
American Urological Association
Association of American Medical Colleges
College of American Pathologists
Joint Council of Allergy, Asthma and Immunology
Medical Group Management Association
Renal Physicians Association
Society for Interventional Radiology
Society for Vascular Surgery
Society of Hospital Medicine