

Changes Ahead in Data Standards

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By Kathy Giannangelo, MA, RHIA, CCS, CPHIMS, FAHIMA

HIM professionals are most familiar with the data standards mandated through HIPAA. However, the data standard adoption process is also now part of the requirements for EHR technology in the meaningful use program.

Understanding the data standards adoption process under HIPAA and the meaningful use program can help HIM professionals prepare for and implement the data standards changes necessary to implement ICD-10-CM/PCS for each initiative.

Data Standards Adoption under HIPAA

HIPAA's administrative simplification provisions required the Department of Health and Human Services (HHS) to establish national standards for electronic healthcare transactions. HIPAA transactions involve the electronic exchange of healthcare information. A covered entity engaging in an identified electronic transaction must comply with the standard for that transaction by adhering to its content and format requirements.

Specific code sets for diagnosis and procedures were named as standards for the content and must be used in HIPAA transactions. Through the publication of regulations the HHS secretary dictates which standards are used for administrative transactions. ICD-9-CM is the current standard for reporting diagnosis and hospital inpatient procedures.

Data Standards Adoption under the Meaningful Use Program

Provisions in the American Recovery and Reinvestment Act mandated the meaningful use incentive program. The HHS secretary issues regulations for the program via two agencies: the Centers for Medicare and Medicaid Services (CMS) and the Office of the National Coordinator for Health IT (ONC).

CMS publishes the rules that define the minimum requirements providers must meet through their use of EHRs in order to qualify for payments under the incentive program. However, CMS's regulations do not specify the data standards that must be entered into the qualified EHRs so data can be reported in a structured format to qualify for the incentive payments.

ONC publishes complementary regulations to CMS's regulations that establish the set of standards, implementation specifications, and certification criteria for EHRs. EHR technology must meet the data standards outlined in ONC's regulations to be certified for use in the program.

In stage 1 of the meaningful use program, one of the standards ONC adopted for the entry of structured data is ICD-9-CM. The code set is named as the standard when the certification criteria mentions data elements for problems and procedures performed by eligible professionals, eligible hospitals, and critical access hospitals.

ICD-10-CM/PCS Adoption Process

On January 16, 2009, the HHS secretary published a rule establishing the implementation of ICD-10-CM/PCS. It mandated that on October 1, 2013, the HIPAA data standards for diagnoses and hospital inpatient hospital procedures will be ICD-10-CM and ICD-10-PCS.

Work on stage 2 meaningful use criteria and its accompanying standards, implementation specifications, and certification criteria are under way. ICD-10-CM/PCS are expected to replace ICD-9-CM as the standards that certified EHR technology must use to support the stage 2 objectives.

In addition, ONC intends to include administrative transaction standards and certification criteria to support stage 2 of meaningful use. The administrative transaction data standards are those adopted under HIPAA. Thus, if the final regulations include administrative transaction standards and certification criteria, ICD-10-CM/PCS will become a data standard for certified EHR technology under the meaningful use incentive program, aligning the standards for administrative transactions in EHRs with the administrative simplification provisions in the Affordable Care Act.

The work on the standards, implementation specifications, and certification criteria for stage 2 of the meaningful use program is going on now. The Health IT Standards Committee and its Clinical Quality Workgroup and Vocabulary Task Force subsidiaries will discuss the data standards, including ICD-10-CM/PCS. These groups will provide recommendations to ONC on which data standards should be adopted for stages 2 and 3 of the meaningful use program. ONC is expected to issue a proposed rule on stage 2 by the end of this year, with a final rule to come in 2012.

As proposals are formed, HIM professionals should monitor the work of these groups and look for opportunities to provide comments on their recommendations.

Opportunities for HIM Professionals

HIM professionals are at the forefront of the transition from paper to EHRs and ICD-9-CM to ICD-10-CM/PCS. As such they have the opportunity to influence which data standards will be adopted for the electronic capture of uniformly structured data as required for certified EHR technology.

The implementation of the stage 2 meaningful use criteria in 2013, happening in tandem with ICD-10-CM/PCS implementation, will have a major impact on resources. As leaders in these key initiatives, HIM professionals must outline the overlap in the timelines, determine the critical points for the implementation of each, carefully plan how best to convert to EHRs, obtain uniformly structured data, and successfully transition to ICD-10-CM/PCS.

References

AHIMA. "Solicitation of Comments-Meaningful Use Stage 2." February 25, 2011. www.ahima.org

Centers for Medicare and Medicaid Services. "Overview of Electronic Transactions & Code Sets." HIPAA Information Series. May 2003. www.cms.gov/EducationMaterials/02_HIPAAMaterials.asp.

Centers for Medicare and Medicaid Services. "CMS Finalizes Definition of Meaningful Use of Certified Electronic Health Records (EHR) Technology." July 30, 2010. www.cms.gov.

Office of the National Coordinator for Health IT. "Health Information Technology: Initial Set of Standards, Implementation Specifications, and Certification Criteria for Electronic Health Record Technology; Final Rule. *Federal Register* 75, no. 144 (July 28, 2010). <http://edocket.access.gpo.gov/2010/pdf/2010-17210.pdf>.

Kathy Giannangelo (kathy.giannangelo@gmail.com) is an HIM consultant.

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