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Bob Thompson, Chairman | Margaret A. Murray, Chief Executive Officer

The Honorable Kathleen Sebelius
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W. – Room 120F
Washington, DC 20201

March 26, 2012

Dear Secretary Sebelius:

This letter is in response to the Center for Medicare and Medicaid Services (CMS) announcement that delays in ICD-10 implementation deadline were being considered. The Association of Community Affiliated Plans (ACAP), an organization representing 57 safety net health plans in 26 states that serve approximately 9.5 million publicly insured members, supports CMS' willingness to consider legitimate concerns with the current implementation date and to delay the current compliance date.

Currently, ICD-10 implementation is due to take effect on October 1, 2013. This is the same period that enrollment in the newly created Exchanges will begin. In addition, preparations will be underway for the largest expansion of Medicaid in the program's history. Much of the efforts necessary to implement ICD-10 will draw from information technology and clinical management departments. We strongly believe that during this extremely sensitive time, all health plan efforts, especially in these two critical departments, should be focused exclusively on the smooth implementation of those activities critical to success of the health reform efforts. Therefore, *we support delaying the ICD-10 implementation by two years in order to allow an undivided focus on health reform efforts.* During this period, we would support the development of a rational development schedule with appropriate timeframes that would apply to all entities (for example, setting a "ready to test" deadline).

It is important to note that we vigorously support a simultaneous delay of the ICD-10 implementation date for all providers, payers and purchasers. We believe that setting different compliance dates for providers versus payers and purchasers will serve no benefit and will only drive up costs and result in increased confusion. Therefore, we strongly oppose setting different ICD-10 compliance date for different entities.

Thank you again for taking this prudent action to delay the ICD-10 compliance date. If you have any questions concerning these comments, please contact me at 202-204-7508.

Sincerely,

Margaret A Murray
CEO

cc: Marilyn Tavenner