



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Robert Bentley
Governor of Alabama
Office of the Governor
600 Dexter Avenue
Montgomery, AL 36130-2751

Dear Governor Bentley,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Alabama. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Providers have raised concerns that ICD-10 coding is intrinsic to clinical documentation and reporting processes, and systems are not designed to capture and maintain both the International Classification of Diseases, Ninth Revision, Clinical Modification (ICD-9-CM) "ICD-9" and ICD-10 versions simultaneously. The result could be a significant increase in manual effort and re-work to process these non-healthcare claims if both ICD-9 and ICD-10 coded bills are submitted after October 1, 2015. As providers transition to ICD-10, they are raising important concerns that their states' legacy ICD-9 coding requirements, applicable to property and casualty payers, will impose unnecessary burden, cost and possible delay or compromising of patient care.

To further compound the impacts, property and casualty carriers (and other non-group health plans), even in the absence of a state ICD-10 mandate, will be faced with their own federal ICD-10 mandate, as a result of the Centers for Medicare & Medicaid Services (CMS) Mandatory Insurer Reporting For Non-Group Health Plan requirements under the Medicare program. Under Medicare reforms passed in 2007, such Responsible Reporting Entities (RREs) must report claims that may have impacted Medicare beneficiaries. This reporting requirement was recently updated to adopt ICD-10 for claims with date of incident on or after October 1, 2015, with such reporting made mandatory as of April 1, 2015. ICD-9 codes cannot readily be converted to

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WEDI seeks your assistance to ensure that property and casualty, workers' compensation and non-group health plans are aware of the upcoming mandate to move to the use of ICD-10 for transactions adopted under HIPAA. WEDI also seeks your assistance to encourage the implementation of the new ICD-10 code sets by property and casualty, workers' compensation and non-group health plans within your state to align with the codes which will be used nationally in healthcare. Unless action is taken by your state, hospitals and physician practices will be faced with conflicting requirements to report both ICD-9 and ICD-10 on different types of bills. Carriers would be forced to use one set of codes to satisfy state claiming requirements and a different set of codes to meet federal reporting requirements.

As of February 2014, 19 states have indicated they will align or are planning to align with federally mandated healthcare administrative simplification by requiring the use of ICD-10 by providers and payers for property and casualty bills and related reporting. We strongly encourage your state to join these other states and align the property and casualty, workers' compensation and non-group health plan sectors with the healthcare sector to utilize ICD-10 across all insurance sectors. It is critical that you let both the Secretary of HHS and WEDI know your state's approach and timelines for the adoption of ICD-10 within the non-healthcare insurance industry. WEDI is collaborating with HHS to educate the industry about ICD-10 readiness across all sectors of the insurance industry. We respectfully request you share you state's approach and timelines with Devin Jopp, WEDI. This will better assist the healthcare industry during its transition to ICD-10.

WEDI appreciates the opportunity to work with your office to continue to engage the industry on these critical topics and will continue our efforts to help with industry outreach and to identify best approaches in implementation. Please see the CMS website, www.cms.gov, for more information on the Medicare programs referenced earlier. Please do not hesitate to contact me at djopp@wedi.org or 202.618.8788 with any questions specific to the WEDI recommendations.

Sincerely,

/s/

Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Sean Parnell
Governor of Alaska
Office of the Governor
P.O. Box 110001
Juneau, AK 99811-0001

Dear Governor Parnell,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Alaska. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Jan Brewer
Governor of Arizona
Arizona Governor
Executive Tower
1700 West Washington
Phoenix, AZ 85007

Dear Governor Brewer,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Arizona. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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WEDI Board of Directors



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of Information in Healthcare*

October 10, 2014

The Honorable Mike Beebe
Governor of Arkansas
Office of the Governor
Room 250
Little Rock, AR 72201

Dear Governor Beebe,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Arkansas. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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October 10, 2014

The Honorable Edmund G. Brown
Governor of California
Office of the Governor
Suite 1173
Sacramento, CA 95814

Dear Governor Brown,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of California. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable John Hickenlooper
Governor of Colorado
Office of the Governor
136 State Capitol
Denver, CO 80203-1792

Dear Governor Hickenlooper,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Colorado. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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October 10, 2014

The Honorable Dan Malloy
Governor of Connecticut
Office of the Governor
210 Capitol Avenue
Hartford, CT 06106

Dear Governor Malloy,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Connecticut. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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WEDI appreciates the opportunity to work with your office to continue to engage the industry on these critical topics and will continue our efforts to help with industry outreach and to identify best approaches in implementation. Please see the CMS website, www.cms.gov, for more information on the Medicare programs referenced earlier. Please do not hesitate to contact me at djopp@wedi.org or 202.618.8788 with any questions specific to the WEDI recommendations.

Sincerely,

/s/

Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Jack Markell
Governor of Delaware
Office of the Governor
150 Martin Luther King Jr. Blvd. South
2nd Floor
Dover, DE 19901

Dear Governor Markell,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Delaware. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

WEDI is the leading authority on the use of Health IT to improve healthcare information exchange in order to enhance the quality of care, improve efficiency and to reduce costs of the American healthcare system. Formed in 1991 by the Secretary of Health and Human Services (HHS), WEDI was named in the 1996 Health Insurance Portability and Accountability Act (HIPAA) legislation as an advisor to HHS and continues to fulfill that role today. Please see our website www.wedi.org for more information.

Providers have raised concerns that ICD-10 coding is intrinsic to clinical documentation and reporting processes, and systems are not designed to capture and maintain both the International Classification of Diseases, Ninth Revision, Clinical Modification (ICD-9-CM) "ICD-9" and ICD-10 versions simultaneously. The result could be a significant increase in manual effort and re-work to process these non-healthcare claims if both ICD-9 and ICD-10 coded bills are submitted after October 1, 2015. As providers transition to ICD-10, they are raising important concerns that their states' legacy ICD-9 coding requirements, applicable to property and casualty payers, will impose unnecessary burden, cost and possible delay or compromising of patient care.

To further compound the impacts, property and casualty carriers (and other non-group health plans), even in the absence of a state ICD-10 mandate, will be faced with their own federal ICD-10 mandate, as a result of the Centers for Medicare & Medicaid Services (CMS) Mandatory Insurer Reporting For Non-Group Health Plan requirements under the Medicare program. Under Medicare reforms passed in 2007, such Responsible Reporting Entities (RREs) must report claims that may have impacted Medicare beneficiaries. This reporting requirement was recently updated to adopt ICD-10 for claims with date of incident on or after October 1,

2015, with such reporting made mandatory as of April 1, 2015. ICD-9 codes cannot readily be converted to ICD-10; the only way to ensure clinically defensible reporting will be for the carriers to capture the ICD-10 diagnoses created at the point of care.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Rick Scott
Governor of Florida
Office of the Governor
PL 05 The Capitol
400 South Monroe Street
Tallahassee, FL 32399-0001

Dear Governor Scott,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Florida. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Nathan Deal
Governor of Georgia
Office of the Governor
206 Washington Street
Suite 203, State Capitol
Atlanta, GA 30334

Dear Governor Deal,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Georgia. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Neil Abercrombie
Governor of Hawaii
Office of the Governor
Executive Chambers
State Capitol
Honolulu, HI 96813

Dear Governor Abercrombie,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Hawaii. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

/s/

Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable C. L. "Butch" Otter
Governor of Idaho
Office of the Governor
P.O. Box 83720
Boise, ID 83720

Dear Governor Otter,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Idaho. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Pat Quinn
Governor of Illinois
Office of the Governor
207 State House
Springfield, IL 62706

Dear Governor Quinn,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Illinois. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Michael R. Pence
Governor of Indiana
Office of the Governor
200 W. Washington St.
Room 206
Indianapolis, IN 46204-2797

Dear Governor Pence,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Indiana. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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WEDI seeks your assistance to ensure that property and casualty, workers' compensation and non-group health plans are aware of the upcoming mandate to move to the use of ICD-10 for transactions adopted under HIPAA. WEDI also seeks your assistance to encourage the implementation of the new ICD-10 code sets by property and casualty, workers' compensation and non-group health plans within your state to align with the codes which will be used nationally in healthcare. Unless action is taken by your state, hospitals and physician practices will be faced with conflicting requirements to report both ICD-9 and ICD-10 on different types of bills. Carriers would be forced to use one set of codes to satisfy state claiming requirements and a different set of codes to meet federal reporting requirements.

As of February 2014, 19 states have indicated they will align or are planning to align with federally mandated healthcare administrative simplification by requiring the use of ICD-10 by providers and payers for property and casualty bills and related reporting. We strongly encourage your state to join these other states and align the property and casualty, workers' compensation and non-group health plan sectors with the healthcare sector to utilize ICD-10 across all insurance sectors. It is critical that you let both the Secretary of HHS and WEDI know your state's approach and timelines for the adoption of ICD-10 within the non-healthcare insurance industry. WEDI is collaborating with HHS to educate the industry about ICD-10 readiness across all sectors of the insurance industry. We respectfully request you share you state's approach and timelines with Devin Jopp, WEDI. This will better assist the healthcare industry during its transition to ICD-10.

WEDI appreciates the opportunity to work with your office to continue to engage the industry on these critical topics and will continue our efforts to help with industry outreach and to identify best approaches in implementation. Please see the CMS website, www.cms.gov, for more information on the Medicare programs referenced earlier. Please do not hesitate to contact me at djopp@wedi.org or 202.618.8788 with any questions specific to the WEDI recommendations.

Sincerely,

/s/

Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Terry E. Branstad
Governor of Iowa
Office of the Governor
1007 East Grand Ave.
Des Moines, IA 50319-0001

Dear Governor Branstad,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Iowa. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Sam Brownback
Governor of Kansas
Office of the Governor
Capitol
300 SW 10th Avenue
Suite 241S
Topeka, KS 66612-1590

Dear Governor Brownback,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Kansas. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Steven L. Beshear
Governor of Kentucky
Office of the Governor
700 Capitol Ave.
Suite 100
Frankfort, KY 40601

Dear Governor Beshear,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the Commonwealth of Kentucky. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Bobby Jindal
Governor of Louisiana
Office of the Governor
P. O. Box 94004
Baton Rouge, LA 70804-9004

Dear Governor Jindal,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Louisiana. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Paul R. LePage
Governor of Maine
Office of the Governor
#1 State House Station
Augusta, ME 04333-0001

Dear Governor LePage,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Maine. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Martin O'Malley
Governor of Maryland
Office of the Governor
100 State Circle
Annapolis, MD 21401

Dear Governor O'Malley,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Maryland. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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cc: The Honorable Sylvia Mathews Burwell
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*Partnering for Electronic Delivery
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October 10, 2014

The Honorable Deval Patrick
Governor of Massachusetts
Office of the Governor
Massachusetts State House
Office of the Governor
Room 105
Boston, MA 02133

Dear Governor Patrick,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the Commonwealth of Massachusetts. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Providers have raised concerns that ICD-10 coding is intrinsic to clinical documentation and reporting processes, and systems are not designed to capture and maintain both the International Classification of Diseases, Ninth Revision, Clinical Modification (ICD-9-CM) "ICD-9" and ICD-10 versions simultaneously. The result could be a significant increase in manual effort and re-work to process these non-healthcare claims if both ICD-9 and ICD-10 coded bills are submitted after October 1, 2015. As providers transition to ICD-10, they are raising important concerns that their states' legacy ICD-9 coding requirements, applicable to property and casualty payers, will impose unnecessary burden, cost and possible delay or compromising of patient care.

To further compound the impacts, property and casualty carriers (and other non-group health plans), even in the absence of a state ICD-10 mandate, will be faced with their own federal ICD-10 mandate, as a result of the Centers for Medicare & Medicaid Services (CMS) Mandatory Insurer Reporting For Non-Group Health Plan requirements under the Medicare program. Under Medicare reforms passed in 2007, such Responsible

Reporting Entities (RREs) must report claims that may have impacted Medicare beneficiaries. This reporting requirement was recently updated to adopt ICD-10 for claims with date of incident on or after October 1, 2015, with such reporting made mandatory as of April 1, 2015. ICD-9 codes cannot readily be converted to ICD-10; the only way to ensure clinically defensible reporting will be for the carriers to capture the ICD-10 diagnoses created at the point of care.

WEDI seeks your assistance to ensure that property and casualty, workers' compensation and non-group health plans are aware of the upcoming mandate to move to the use of ICD-10 for transactions adopted under HIPAA. WEDI also seeks your assistance to encourage the implementation of the new ICD-10 code sets by property and casualty, workers' compensation and non-group health plans within your state to align with the codes which will be used nationally in healthcare. Unless action is taken by your state, hospitals and physician practices will be faced with conflicting requirements to report both ICD-9 and ICD-10 on different types of bills. Carriers would be forced to use one set of codes to satisfy state claiming requirements and a different set of codes to meet federal reporting requirements.

As of February 2014, 19 states have indicated they will align or are planning to align with federally mandated healthcare administrative simplification by requiring the use of ICD-10 by providers and payers for property and casualty bills and related reporting. We strongly encourage your state to join these other states and align the property and casualty, workers' compensation and non-group health plan sectors with the healthcare sector to utilize ICD-10 across all insurance sectors. It is critical that you let both the Secretary of HHS and WEDI know your state's approach and timelines for the adoption of ICD-10 within the non-healthcare insurance industry. WEDI is collaborating with HHS to educate the industry about ICD-10 readiness across all sectors of the insurance industry. We respectfully request you share you state's approach and timelines with Devin Jopp, WEDI. This will better assist the healthcare industry during its transition to ICD-10.

WEDI appreciates the opportunity to work with your office to continue to engage the industry on these critical topics and will continue our efforts to help with industry outreach and to identify best approaches in implementation. Please see the CMS website, www.cms.gov, for more information on the Medicare programs referenced earlier. Please do not hesitate to contact me at djopp@wedi.org or 202.618.8788 with any questions specific to the WEDI recommendations.

Sincerely,

/s/

Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Rick Snyder
Governor of Michigan
Office of the Governor
P.O. Box 30013
Lansing, MI 48909

Dear Governor Snyder,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Michigan. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Mark Dayton
Governor of Minnesota
Office of the Governor
130 State Capitol
75 Rev. Dr. Martin Luther King Jr. Boulevard
St. Paul, MN 55155

Dear Governor Dayton,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Minnesota. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Phil Bryant
Governor of Mississippi
Office of the Governor
P.O. Box 139
Jackson, MS 39205

Dear Governor Bryant,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Mississippi. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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cc: The Honorable Sylvia Mathews Burwell
NAIC
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*Partnering for Electronic Delivery
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October 10, 2014

The Honorable Jeremiah W. Nixon
Governor of Missouri
Office of the Governor
P.O. Box 720
Jefferson City, MO 65102

Dear Governor Nixon,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Missouri. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Steve Bullock
Governor of Montana
Office of the Governor
P.O. Box 200801
Helena, MT 59620-0801

Dear Governor Bullock,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Montana. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Dave Heineman
Governor of Nebraska
Office of the Governor
P.O. Box 94848
Lincoln, NE 68509-4848

Dear Governor Heineman,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Nebraska. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

/s/

Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Brian Sandoval
Governor of Nevada
Office of the Governor
State Capitol Building
101 N. Carson St.
Carson City, NV 89701

Dear Governor Sandoval,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Nevada. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

WEDI is the leading authority on the use of Health IT to improve healthcare information exchange in order to enhance the quality of care, improve efficiency and to reduce costs of the American healthcare system. Formed in 1991 by the Secretary of Health and Human Services (HHS), WEDI was named in the 1996 Health Insurance Portability and Accountability Act (HIPAA) legislation as an advisor to HHS and continues to fulfill that role today. Please see our website www.wedi.org for more information.

Providers have raised concerns that ICD-10 coding is intrinsic to clinical documentation and reporting processes, and systems are not designed to capture and maintain both the International Classification of Diseases, Ninth Revision, Clinical Modification (ICD-9-CM) "ICD-9" and ICD-10 versions simultaneously. The result could be a significant increase in manual effort and re-work to process these non-healthcare claims if both ICD-9 and ICD-10 coded bills are submitted after October 1, 2015. As providers transition to ICD-10, they are raising important concerns that their states' legacy ICD-9 coding requirements, applicable to property and casualty payers, will impose unnecessary burden, cost and possible delay or compromising of patient care.

To further compound the impacts, property and casualty carriers (and other non-group health plans), even in the absence of a state ICD-10 mandate, will be faced with their own federal ICD-10 mandate, as a result of the Centers for Medicare & Medicaid Services (CMS) Mandatory Insurer Reporting For Non-Group Health Plan requirements under the Medicare program. Under Medicare reforms passed in 2007, such Responsible Reporting Entities (RREs) must report claims that may have impacted Medicare beneficiaries. This reporting requirement was recently updated to adopt ICD-10 for claims with date of incident on or after October 1,

2015, with such reporting made mandatory as of April 1, 2015. ICD-9 codes cannot readily be converted to ICD-10; the only way to ensure clinically defensible reporting will be for the carriers to capture the ICD-10 diagnoses created at the point of care.

WEDI seeks your assistance to ensure that property and casualty, workers' compensation and non-group health plans are aware of the upcoming mandate to move to the use of ICD-10 for transactions adopted under HIPAA. WEDI also seeks your assistance to encourage the implementation of the new ICD-10 code sets by property and casualty, workers' compensation and non-group health plans within your state to align with the codes which will be used nationally in healthcare. Unless action is taken by your state, hospitals and physician practices will be faced with conflicting requirements to report both ICD-9 and ICD-10 on different types of bills. Carriers would be forced to use one set of codes to satisfy state claiming requirements and a different set of codes to meet federal reporting requirements.

As of February 2014, 19 states have indicated they will align or are planning to align with federally mandated healthcare administrative simplification by requiring the use of ICD-10 by providers and payers for property and casualty bills and related reporting. We strongly encourage your state to join these other states and align the property and casualty, workers' compensation and non-group health plan sectors with the healthcare sector to utilize ICD-10 across all insurance sectors. It is critical that you let both the Secretary of HHS and WEDI know your state's approach and timelines for the adoption of ICD-10 within the non-healthcare insurance industry. WEDI is collaborating with HHS to educate the industry about ICD-10 readiness across all sectors of the insurance industry. We respectfully request you share you state's approach and timelines with Devin Jopp, WEDI. This will better assist the healthcare industry during its transition to ICD-10.

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Devin Jopp, Ed.D., President and CEO

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NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Maggie Hassan
Governor of New Hampshire
Office of the Governor
State House
107 North Main Street
Concord, NH 03301

Dear Governor Hassan,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of New Hampshire. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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cc: The Honorable Sylvia Mathews Burwell
NAIC
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WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Christopher Christie
Governor of New Jersey
Office of the Governor
P.O. Box 001
Trenton, NJ 08625

Dear Governor Christie,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of New Jersey. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Susana Martinez
Governor of New Mexico
Office of the Governor
490 Old Santa Fe Trail
Room 400
Santa Fe, NM 87501

Dear Governor Martinez,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of New Mexico. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Andrew M. Cuomo
Governor of New York
Office of the Governor
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of New York. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Pat McCrory
Governor of North Carolina
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Dear Governor McCrory,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of North Carolina. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Jack Dalrymple
Governor of North Dakota
Office of the Governor
600 E. Boulevard Ave.
Bismarck, ND 58505-0001

Dear Governor Dalrymple,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of North Dakota. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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As of February 2014, 19 states have indicated they will align or are planning to align with federally mandated healthcare administrative simplification by requiring the use of ICD-10 by providers and payers for property and casualty bills and related reporting. We strongly encourage your state to join these other states and align the property and casualty, workers' compensation and non-group health plan sectors with the healthcare sector to utilize ICD-10 across all insurance sectors. It is critical that you let both the Secretary of HHS and WEDI know your state's approach and timelines for the adoption of ICD-10 within the non-healthcare insurance industry. WEDI is collaborating with HHS to educate the industry about ICD-10 readiness across all sectors of the insurance industry. We respectfully request you share you state's approach and timelines with Devin Jopp, WEDI. This will better assist the healthcare industry during its transition to ICD-10.

WEDI appreciates the opportunity to work with your office to continue to engage the industry on these critical topics and will continue our efforts to help with industry outreach and to identify best approaches in implementation. Please see the CMS website, www.cms.gov, for more information on the Medicare programs referenced earlier. Please do not hesitate to contact me at djopp@wedi.org or 202.618.8788 with any questions specific to the WEDI recommendations.

Sincerely,

/s/

Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable John R. Kasich
Governor of Ohio
Office of the Governor
Riffe Center , 30th Floor
77 South High Street
Columbus, OH 43215-6117

Dear Governor Kasich,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Ohio. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Providers have raised concerns that ICD-10 coding is intrinsic to clinical documentation and reporting processes, and systems are not designed to capture and maintain both the International Classification of Diseases, Ninth Revision, Clinical Modification (ICD-9-CM) "ICD-9" and ICD-10 versions simultaneously. The result could be a significant increase in manual effort and re-work to process these non-healthcare claims if both ICD-9 and ICD-10 coded bills are submitted after October 1, 2015. As providers transition to ICD-10, they are raising important concerns that their states' legacy ICD-9 coding requirements, applicable to property and casualty payers, will impose unnecessary burden, cost and possible delay or compromising of patient care.

To further compound the impacts, property and casualty carriers (and other non-group health plans), even in the absence of a state ICD-10 mandate, will be faced with their own federal ICD-10 mandate, as a result of the Centers for Medicare & Medicaid Services (CMS) Mandatory Insurer Reporting For Non-Group Health Plan requirements under the Medicare program. Under Medicare reforms passed in 2007, such Responsible Reporting Entities (RREs) must report claims that may have impacted Medicare beneficiaries. This reporting requirement was recently updated to adopt ICD-10 for claims with date of incident on or after October 1,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Mary Fallin
Governor of Oklahoma
Office of the Governor
Oklahoma State Capitol
2300 Lincoln Blvd.
Rm. 212
Oklahoma City, OK 73105

Dear Governor Fallin,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Oklahoma. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable John A. Kitzhaber, M.D.
Governor of Oregon
Office of the Governor
State Capitol Building
900 Court St. NE, 160
Salem, OR 97301

Dear Governor Kitzhaber, M.D.,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Oregon. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Tom Corbett
Governor of Pennsylvania
Office of the Governor
Main Capitol Building
Room 225
Harrisburg, PA 17120

Dear Governor Corbett,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the Commonwealth of Pennsylvania. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Lincoln D. Chafee
Governor of Rhode Island
Office of the Governor
82 Smith St.
Providence, RI 02903

Dear Governor Chafee,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Rhode Island. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Nikki R. Haley
Governor of South Carolina
Office of the Governor
1205 Pendleton Street
Columbia, SC 29201

Dear Governor Haley,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of South Carolina. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Dennis Daugaard
Governor of South Dakota
Office of the Governor
500 East Capitol Street
Pierre, SD 57501

Dear Governor Daugaard,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of South Dakota. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Providers have raised concerns that ICD-10 coding is intrinsic to clinical documentation and reporting processes, and systems are not designed to capture and maintain both the International Classification of Diseases, Ninth Revision, Clinical Modification (ICD-9-CM) "ICD-9" and ICD-10 versions simultaneously. The result could be a significant increase in manual effort and re-work to process these non-healthcare claims if both ICD-9 and ICD-10 coded bills are submitted after October 1, 2015. As providers transition to ICD-10, they are raising important concerns that their states' legacy ICD-9 coding requirements, applicable to property and casualty payers, will impose unnecessary burden, cost and possible delay or compromising of patient care.

To further compound the impacts, property and casualty carriers (and other non-group health plans), even in the absence of a state ICD-10 mandate, will be faced with their own federal ICD-10 mandate, as a result of the Centers for Medicare & Medicaid Services (CMS) Mandatory Insurer Reporting For Non-Group Health Plan requirements under the Medicare program. Under Medicare reforms passed in 2007, such Responsible Reporting Entities (RREs) must report claims that may have impacted Medicare beneficiaries. This reporting requirement was recently updated to adopt ICD-10 for claims with date of incident on or after October 1,

2015, with such reporting made mandatory as of April 1, 2015. ICD-9 codes cannot readily be converted to ICD-10; the only way to ensure clinically defensible reporting will be for the carriers to capture the ICD-10 diagnoses created at the point of care.

WEDI seeks your assistance to ensure that property and casualty, workers' compensation and non-group health plans are aware of the upcoming mandate to move to the use of ICD-10 for transactions adopted under HIPAA. WEDI also seeks your assistance to encourage the implementation of the new ICD-10 code sets by property and casualty, workers' compensation and non-group health plans within your state to align with the codes which will be used nationally in healthcare. Unless action is taken by your state, hospitals and physician practices will be faced with conflicting requirements to report both ICD-9 and ICD-10 on different types of bills. Carriers would be forced to use one set of codes to satisfy state claiming requirements and a different set of codes to meet federal reporting requirements.

As of February 2014, 19 states have indicated they will align or are planning to align with federally mandated healthcare administrative simplification by requiring the use of ICD-10 by providers and payers for property and casualty bills and related reporting. We strongly encourage your state to join these other states and align the property and casualty, workers' compensation and non-group health plan sectors with the healthcare sector to utilize ICD-10 across all insurance sectors. It is critical that you let both the Secretary of HHS and WEDI know your state's approach and timelines for the adoption of ICD-10 within the non-healthcare insurance industry. WEDI is collaborating with HHS to educate the industry about ICD-10 readiness across all sectors of the insurance industry. We respectfully request you share you state's approach and timelines with Devin Jopp, WEDI. This will better assist the healthcare industry during its transition to ICD-10.

WEDI appreciates the opportunity to work with your office to continue to engage the industry on these critical topics and will continue our efforts to help with industry outreach and to identify best approaches in implementation. Please see the CMS website, www.cms.gov, for more information on the Medicare programs referenced earlier. Please do not hesitate to contact me at djopp@wedi.org or 202.618.8788 with any questions specific to the WEDI recommendations.

Sincerely,

/s/

Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Bill Haslam
Governor of Tennessee
Office of the Governor
1st Floor, State Capitol
Nashville, TN 37243

Dear Governor Haslam,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Tennessee. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Rick Perry
Governor of Texas
Office of the Governor
P.O. Box 12428
Austin, TX 78711

Dear Governor Perry,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Texas. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Gary Richard Herbert
Governor of Utah
Office of the Governor
Utah State Capitol Complex
350 North State St., Suite 200
P.O. Box 142220
Salt Lake City, UT 84114-2220

Dear Governor Herbert,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Utah. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Peter Shumlin
Governor of Vermont
Office of the Governor
109 State Street, Pavilion
Montpelier, VT 05609

Dear Governor Shumlin,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Vermont. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
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WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Terry McAuliffe
Governor of Virginia
Office of the Governor
1111 East Broad St
Richmond, VA 23219

Dear Governor McAuliffe,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the Commonwealth of Virginia. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

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Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Jay Inslee
Governor of Washington
Office of the Governor
P.O. Box 40002
Olympia, WA 98504-0002

Dear Governor Inslee,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Washington. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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Sincerely,

/s/

Devin Jopp, Ed.D., President and CEO

cc: The Honorable Sylvia Mathews Burwell
NAIC
NGA
WEDI Board of Directors



*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Earl Ray Tomblin
Governor of West Virginia
Office of the Governor
1900 Kanawha Boulevard, East
Charleston, WV 25305

Dear Governor Tomblin,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of West Virginia. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

WEDI is the leading authority on the use of Health IT to improve healthcare information exchange in order to enhance the quality of care, improve efficiency and to reduce costs of the American healthcare system. Formed in 1991 by the Secretary of Health and Human Services (HHS), WEDI was named in the 1996 Health Insurance Portability and Accountability Act (HIPAA) legislation as an advisor to HHS and continues to fulfill that role today. Please see our website www.wedi.org for more information.

Providers have raised concerns that ICD-10 coding is intrinsic to clinical documentation and reporting processes, and systems are not designed to capture and maintain both the International Classification of Diseases, Ninth Revision, Clinical Modification (ICD-9-CM) "ICD-9" and ICD-10 versions simultaneously. The result could be a significant increase in manual effort and re-work to process these non-healthcare claims if both ICD-9 and ICD-10 coded bills are submitted after October 1, 2015. As providers transition to ICD-10, they are raising important concerns that their states' legacy ICD-9 coding requirements, applicable to property and casualty payers, will impose unnecessary burden, cost and possible delay or compromising of patient care.

To further compound the impacts, property and casualty carriers (and other non-group health plans), even in the absence of a state ICD-10 mandate, will be faced with their own federal ICD-10 mandate, as a result of the Centers for Medicare & Medicaid Services (CMS) Mandatory Insurer Reporting For Non-Group Health Plan requirements under the Medicare program. Under Medicare reforms passed in 2007, such Responsible Reporting Entities (RREs) must report claims that may have impacted Medicare beneficiaries. This reporting requirement was recently updated to adopt ICD-10 for claims with date of incident on or after October 1,

2015, with such reporting made mandatory as of April 1, 2015. ICD-9 codes cannot readily be converted to ICD-10; the only way to ensure clinically defensible reporting will be for the carriers to capture the ICD-10 diagnoses created at the point of care.

WEDI seeks your assistance to ensure that property and casualty, workers' compensation and non-group health plans are aware of the upcoming mandate to move to the use of ICD-10 for transactions adopted under HIPAA. WEDI also seeks your assistance to encourage the implementation of the new ICD-10 code sets by property and casualty, workers' compensation and non-group health plans within your state to align with the codes which will be used nationally in healthcare. Unless action is taken by your state, hospitals and physician practices will be faced with conflicting requirements to report both ICD-9 and ICD-10 on different types of bills. Carriers would be forced to use one set of codes to satisfy state claiming requirements and a different set of codes to meet federal reporting requirements.

As of February 2014, 19 states have indicated they will align or are planning to align with federally mandated healthcare administrative simplification by requiring the use of ICD-10 by providers and payers for property and casualty bills and related reporting. We strongly encourage your state to join these other states and align the property and casualty, workers' compensation and non-group health plan sectors with the healthcare sector to utilize ICD-10 across all insurance sectors. It is critical that you let both the Secretary of HHS and WEDI know your state's approach and timelines for the adoption of ICD-10 within the non-healthcare insurance industry. WEDI is collaborating with HHS to educate the industry about ICD-10 readiness across all sectors of the insurance industry. We respectfully request you share you state's approach and timelines with Devin Jopp, WEDI. This will better assist the healthcare industry during its transition to ICD-10.

WEDI appreciates the opportunity to work with your office to continue to engage the industry on these critical topics and will continue our efforts to help with industry outreach and to identify best approaches in implementation. Please see the CMS website, www.cms.gov, for more information on the Medicare programs referenced earlier. Please do not hesitate to contact me at djopp@wedi.org or 202.618.8788 with any questions specific to the WEDI recommendations.

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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Scott Walker
Governor of Wisconsin
Office of the Governor
115 East State Capitol
Madison, WI 53707

Dear Governor Walker,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Wisconsin. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Matthew Mead
Governor of Wyoming
Office of the Governor
State Capitol
200 West 24th St
Cheyenne, WY 82002-0010

Dear Governor Mead,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the State of Wyoming. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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*Partnering for Electronic Delivery
of Information in Healthcare*

October 10, 2014

The Honorable Vincent C. Gray
Mayor of the District of Columbia
Executive Office of the Mayor
1350 Pennsylvania Avenue, NW,
Suite 316
Washington, DC 20004

Dear Mayor Gray,

The Workgroup for Electronic Data Interchange (WEDI) writes today to bring to your attention an issue of importance to providers of healthcare and others operating in the District of Columbia. As a result of a federal mandate, hospitals, physician practices and other healthcare providers must start using the International Classification of Diseases, 10th Revision (ICD-10-CM and ICD-10-PCS) Medical Data Code Sets (ICD-10) starting October 1, 2015. However, as property and casualty carriers, including workers' compensation and auto, are governed by state law rather than federal regulations, they are not subject to this mandate. This may hinder providers in their ability to conduct healthcare transactions and patient service and care could be negatively impacted. We ask for your assistance to ensure that these entities adopt this new code set.

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