

September 19, 2006

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

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

Dear Majority Leader Frist:

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

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

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

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

Sincerely,

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

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

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