



May 23, 2013

Senator Tom Coburn
172 Russell Senate Office Building
United States Senate
Washington, D.C. 20510

Dear Senator Coburn:

On behalf of its membership of over 9,000 rheumatologists and rheumatology health professionals, the American College of Rheumatology strongly endorses the *Cutting Costly Codes* Act, S. 972, which would prohibit the Secretary of Health and Human Services from replacing ICD-9 with ICD-10. This important legislation would also direct the GAO to conduct a study to identify steps to mitigate the disruption to health care providers resulting from a replacement of ICD-9. **The ACR urges HHS to skip ICD-10 completely and instead implement ICD-11 when it is ready.**

As you are aware, health care providers use the International Classification of Diseases to make diagnoses and record statistics. In the United States, providers currently use ICD-9 which includes 13,000 codes. If ICD-10 is implemented as scheduled on October 1, 2014, the number of codes will increase to 68,000.

In rheumatology, like many other specialties, the effects of this change would be very harmful. For example, ICD-9 has one code for rheumatoid arthritis – the most common disease rheumatologists treat – but ICD-10 includes 78 possible codes. Learning to adapt to this level of complexity will require significant training for physicians and staff. In addition to this administrative burden, there would be a substantial economic burden. As HIPAA-covered entities, physicians must comply with the ICD-10 mandate and bear all costs associated with the transition. For a small practice it is estimated that implementation will cost \$83,000. Physicians will have a very difficult time with these burdens given the many other demands and changes being experienced by the industry.

The ACR believes passing the S. 972 should be a critical priority of Congress. If ICD-10 is implemented as scheduled on October 1, 2014, it will negatively impact practices nationwide and threaten the care of many patients with chronic and life-threatening conditions.

Thank you for your leadership in introducing this legislation. We look forward to working with you to ensure the passage of this important legislation.

Sincerely,

Tim Laing, MD
Chair, Government Affairs Committee
American College of Rheumatology