

Public comment from David Owen, Director of Market Development, Nuance Communications, on 2/13/12 ONC HIT Policy Meaningful Use and Certification/Adoption workgroups.

- 1 Consider policies and funding for deriving secondary use value from ICD-10, rather than driving demand for data not already part of ICD-10.
- 2 Consider including the coder and CDI specialist in the definition of the care team.

ICD-10 is the elephant in the room. With an eight-fold increase in the number of codes, the productivity and financial impact to providers is inevitable, and not insignificant. (see references below and attached). This workgroup has the potential to either exacerbate the problem or to help mitigate the impact. Providing policies and/or funding for secondary uses of ICD-10 will steer efforts towards methods that will leverage the added effort physicians will already have to undertake.

Today the coder and CDI specialist are often considered to be emissaries of secondary use. However, as clinical documentation's transparency to the patient grows, physicians will come to see them as a partner in patient care.

- https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&cad=rja&ved=0CDcQFjAB&url=http%3A%2F%2Fwww.bcbsnc.com%2Fassets%2Fproviders%2Fpublic%2Fpdfs%2Fbulletin_june_2011.pdf&ei=mx0cUYSkCqfH0QH_zrIHIBQ&usg=AFQjCNGEueb5zfyTrtF1BzgCLpbmhFEgEA&sig2=CMx_FZSpun8Cw5IQa--ueg&bvm=bv.42452523,bs.1,d.cWE
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