Circular no. 7 of 2025
15 May 2025

ICD-10 Coding Implementation Update

1. Background

In December 2024, Namaf announced that **Phase 2.1** of the ICD-10 implementation will take effect from **1 April 2025 to 30 June 2025**. During this phase, all healthcare providers will be required to submit ICD-10 codes selected from the **ICD-10 Master Industry Table (MIT)**. While claim rejections will not be enforced during this period, scheme administrators must notify providers regarding their level of compliance.

Circular 6 stated that **Phase 2.2** will commence on **1 July 2025 and run until 30 September 2025**. This phase will mandate the submission of **at least one valid 3-character ICD-10 code** per claim by all healthcare providers. Although multiple ICD-10 codes are encouraged, any claim submitted without an ICD-10 code will not be paid—following the **"no ICD-10 code, no pay"** principle. All ICD-10 codes used must be selected from the ICD-10 MIT.

Administrators are expected to validate claims against the ICD-10 MIT to ensure coding accuracy. Non-diagnosing providers are encouraged to submit either a referral diagnosis from the diagnosing provider, a sign or symptom code, or a **Chapter XXI (Z-code)** where appropriate.

2. Preparation for the Phased Implementation of ICD-10

Namaf has initiated several measures to support healthcare stakeholders in meeting the phased ICD-10 requirements. Stakeholders are encouraged to take note of the following initiatives:

2.1. Software Enhancement and Upgrade

Namaf has actively engaged with software vendors and administrators regarding the upcoming ICD-10 implementation. Encouragingly, the majority have provided written confirmation that their software and IT systems are compliant with the requirements for **Phase**

2.2. Namaf is continuing to liaise with those vendors and administrators who have not yet achieved full compliance.

Healthcare stakeholders are reminded to consult the **ICD-10 Technical User Guide** and ensure adherence to the ICD-10 requirements at the claim level, as follows:

- **Practice Management Software Systems (PMS)** must support ICD-10 coding at the line-item level, allowing for **one primary code and up to nine secondary codes per line**.
- **Hospital Systems** must support ICD-10 coding at the claim header level, allowing for **one primary code and up to 19 secondary codes**.
- **Administrator Systems** must accommodate **both formats** to ensure compatibility across all provider types.
- **Switching companies** are required to cater for both the PMS and hospital ICD-10 formats, if switiching claims for both parties.

2.2. ICD-10 Task Team

An **ICD-10 Task Team** has been established, with two meetings held to date. The first meeting, convened on **13 February 2025**, focused on discussing the task team's **structure, terms of reference, core functions**, and **member representation**. During the second meeting, held on **10 March 2025**, these foundational elements were revisited to accommodate the inclusion of new members.

At the second meeting, **Mr. Stephen Tjiuoro** was formally introduced as the Chairperson of the main task team. Additionally, **chairpersons and co-chairpersons** were elected for two sub-committees: the **ICD-10 Morbidity Sub-Committee** and the **Privacy and Confidentiality Sub-Committee**. Each sub-committee was assigned specific responsibilities, which will be addressed in upcoming sessions.

The full composition of the main task team, along with future meeting dates, will be announced at the next scheduled meeting in **May 2025**.

2.3. ICD-10 Webinars, Workshops and Training

To promote awareness and understanding of ICD-10, a series of webinars and workshops were conducted during **February and March 2025**. These educational sessions will continue through **April, May and June 2025**. All healthcare stakeholders are **strongly encouraged to attend** these sessions to ensure readiness and compliance with the ICD-10 implementation requirements.

2.3.1. ICD-10 Webinars

Webinars provide general information on the **implementation of ICD-**10 at no cost to attendees.

2.3.2. ICD-10 Workshops

Workshops are designed to focus more specifically on the **ICD-10 requirements relevant to each provider discipline** at no cost to attendees. They also introduce healthcare stakeholders to the **structure, and basic coding rules** of the ICD-10 system. The ICD-10 workshops do not replace ICD-10 training.

2.3.3. ICD-10 Training

ICD-10 training sessions cover the application of ICD-10 rules, the accurate assignment of codes, and the use of the **ICD-10 Coding Standards Document**. To ensure the correct interpretation and use of ICD-10 codes, **healthcare stakeholders are encouraged to attend the one-day training sessions** at a cost that is payable by the attendee.

3. Conclusion

Stakeholders requiring assistance with ICD-10 implementation are advised to contact Namaf directly.

Action Required:

Complete the questions in Annexure 1.

(see next page)

ANNEXURE 1

Please respond to the questions below and email your answers to: Uatavi Mbai: corporatecomm@namaf.org.na

1. Have you attended an ICD-10 webinar? If yes, how many times have you participated?

    _____

2. Have you attended an ICD-10 workshop? If yes, on how many occasions?

    _____

3. Have you attended any ICD-10 training sessions? If yes, please provide the date(s) of the training.

    _____

4. Are you familiar with the ICD-10 Master Industry Table (MIT)?

    _____

5. Is the ICD-10 MIT integrated into your billing or claims system?

    _____

6. Are you familiar with the ICD-10 Technical User Guide?

    _____

7. Can your billing/claims system accommodate both 4-character and 5-character ICD-10 codes?

    _____

8. Does your billing/claims system allow the entry of any code or an incorrect number of characters in the ICD-10 field (e.g., tariff codes or invalid ICD-10 codes)?

    _____

9. How many ICD-10 codes can be captured per line item in your system?

    _____

10. How many ICD-10 codes can be captured at the header level or for an entire claim?

    _____

11. Does your billing/claims system restrict the entry of invalid ICD-10 codes?

    _____

12. Is your practice or hospital currently submitting ICD-10 codes on all claims?

    _____

13. Is your practice or organisation prepared for the implementation of Phase 2.2 on 01 July 2025?

    _____

14. Who is responsible for ICD-10 coding in your practice or hospital? Kindly provide email address those responsible.

_____

15. Are you familiar with the legal requirements related to ICD-10?

_____

16. Are you aware of the ICD-10 Implementation Task Team?

_____

17. Is your organisation participating in the ICD-10 Task Team meetings? If yes, please provide the name(s) of the participant(s).

_____

18. Are you experiencing any challenges in preparing for ICD-10 implementation? If yes, please describe the challenges.

_____

Kindly ensure that feedback is emailed to tina.riruako@namaf.org.na on or before Tuesday, 20 April 2025.