

Namibian Association of Medical Aid Funds
Established in terms of the Medical Aid Funds Act, 1995 (Act 23 of 1995)



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MEMORANDUM

To: Principal Officers
Managing Directors and Chief Executive Officers of Medical Aid Funds Administration

Date: 27 March 2026

From: Stephen Tjiuoro

SUBJECT: EXTENSION OF PHASE 2.1 AND DEFERMENT OF PHASE 2.2 OF ICD-10 IMPLEMENTATION

We refer to Circular No. 12 of 2026, which informed healthcare stakeholders that Phase 2.2 (the mandatory phase of ICD-10 implementation) would be implemented from **01 April 2026 to 30 June 2026**, and that Phase 3 would commence on **01 July 2026**.

1. Outcome of Industry Data Review

Following the meeting held on 25 March 2026, and the presentation of raw data submitted by medical aid funds for the period 01 November 2025 to 31 December 2025, the analysis revealed significant compliance challenges across the industry:

- 68 disciplines submitted claims without ICD-10 codes.
- 37 disciplines submitted claims containing invalid ICD-10 codes.
- Administrators conducted ICD-10 validations against the ICD-10 Master Industry Table (MIT) at a 3-character level.

Mr. Pieter Theron (President) • Ms. Rachel Kalipi (Vice-President) • Mrs. Dantago Garosas (Treasurer) • Mr. Stephen Tjiuoro (Chief Executive Officer)
• Dr Lea Namoloh • Mr. Sam Kauapirura • Mr. Desley Somseb • Mr. Erastus Molatudi • Mr. Gabriel Tjombe • Mrs. Valeria Muchero

A large, handwritten signature in black ink, appearing to be the name 'Stephen Tjiuoro', is written over the bottom right portion of the document.

These findings clearly indicate that the industry is not yet at the required level of compliance to support the implementation of Phase 2.2 as initially planned.

2. Clarification of Phase 2.1 Requirements

The essence of Phase 2.1 remains as previously communicated:

- No claims will be rejected by medical aid funds.
- All claims submitted to medical aid funds, including those for members of the Public Service Employee Medical Aid Scheme (PSEMAS), must contain ICD-10 codes selected from the ICD-10 MIT.
- Claims from non-diagnosing providers must include:
 - A referral diagnosis from a diagnosing provider; or
 - An appropriate sign and symptom code; or
 - A relevant code from Chapter XXI (Z codes).
- Medical aid fund administrators are required to:
 - Validate the correctness of ICD-10 codes; and
 - Provide feedback to healthcare providers regarding their level of compliance.

Healthcare stakeholders are expected to fully comply with these requirements during Phase 2.1.

3. Revision of Implementation Timelines

In response to the findings and concerns raised by fund administrators and the broader industry regarding readiness:

- Phase 2.2, initially scheduled for implementation on **01 April 2026** as communicated in Circular 12, has been deferred to **01 July 2026**.
- The duration of Phase 2.2 remains undetermined and will be guided by the ICD-10 Task Team based on ongoing assessments.
- The implementation date for Phase 3 is currently unknown and will be determined by the ICD-10 Task Team.

4. Rationale for Deferment

The deferral of Phase 2.2 is a direct response to the low levels of compliance observed across the industry. It is intended to provide stakeholders with sufficient time to:

- Implement corrective measures;
- Address system and operational challenges; and
- Improve overall ICD-10 coding practices.



5. Way Forward

Stakeholders are strongly encouraged to actively participate in the proposed interventions and compliance improvement initiatives to ensure readiness for the revised implementation timelines.

This letter, therefore, serves to inform all healthcare stakeholders that the current ICD -10 Phase 2.1 has been extended, and the implementation of Phase 2.2 (the mandatory phase), where no ICD -10 code and no payment principle applies, originally scheduled for **01 April 2026**, has been deferred to **01 July 2026**.

Please note that this would be the last deferment under Namaf. As **01 July 2026** was hard-coded into some of the fund rules provisions. Further deferment would be a non-compliance with the fund rule.

If you have any questions or require further clarification, please contact Namaf by email to Mrs. Lunza Maswahu at clinicalservices@namaf.org.na.

Yours sincerely,



The image shows a handwritten signature in blue ink over a circular blue stamp. The stamp contains the text 'Chief Executive Officer' around the top edge and 'Namaf' in the center, with a stylized 'N' logo above it.

Stephen Tjiuoro
Chief Executive Officer