

Subject: Established Clinician Documentation & Coding Reviews (ECR)

Effective Date: January 1, 2021

Program Objectives

The Established Clinician Review (ECR) program serves as one of the seven (7) key elements of the Vanderbilt University Medical Center (“VUMC”) Compliance Program. The Office of Compliance and Corporate Integrity (“OCCI”) will administer the ECR Program but, in order to maximize impact of resources and to minimize disruption of routine operations, will endeavor to coordinate with other functions within VUMC which oversee performance, whether those functions are imbedded in the operating unit or oversee and advise aspects of VUMC generally, such as Revenue Cycle, Internal Audit, Risk Management, Legal, and others.

Established Clinician Reviews will inform VUMC whether effective policies, processes, and controls are in place to promote adherence to applicable federal and state laws, rules and regulations; to fulfill contractual obligations with payers (e.g. government and private) and others; and to follow VUMC policy. The ECR Program will present VUMC an opportunity to examine mechanisms for compliance, establish best practices and determine and modify areas of risks and vulnerabilities.

The scope and nature of the Review Program includes:

- Risk-based reviews of clinicians based upon reported risk factors; trends; areas of concern identified through reviews or regulator initiatives; and data analytics
- Routine reviews of departments, divisions, individuals

Review Program Selection and Process:

- The areas of focus for Established Clinician Reviews will be developed and defined in the annual OCCI work plan. The annual work plan will define scheduled reviews for the year, such as New Clinician Reviews, Departmental process reviews, and individual Clinician Review.
- When an area or item has been selected for review, OCCI will review both current processes and individual claim samples. On site visits and/or interviews may be conducted with management responsible for operations (e.g. coding, claims development and submission, documentation, and other related activities).
- **Notification** will be sent from OCCI to responsible parties (e.g. Clinician, Department/Division Chief/Chair, DCE, VMG Coding Assistant Director, Revenue Cycle Manager, etc.) of an area/item selected for review to introduce OCCI personnel, explain the review process and expectations in detail, and request any initial documents and information needed, if any.
- After the review is completed, OCCI will conduct a Quality Review of the information and once the findings are substantiated (agreed), based on a sample review, OCCI will provide a **Preliminary (DRAFT) Report** to the responsible parties for the area/item examined and offer ten (10) business days to critique and provide corrections, questions, or corrective action steps in response to the Preliminary Report.
- OCCI will schedule an educational **meeting** within fifteen (15) days of the issuance of the Preliminary Report to discuss findings and corrective action steps with the responsible parties, if the Accuracy Rate was deemed to be 79% or below.
- The Report will be considered FINAL after the meeting or the ten business days have passed.

Review Program Methodology

OCCI has approved tools and data to extract data according to specific criteria necessary to complete reviews within a predefined scope. Reviews may be completed either by an outside vendor or by OCCI staff.

- The criteria necessary for review will be based on, but is not limited to, a specific department, clinician, single service/procedure, modifiers, Charge Description Master, etc.
- The sample size for each analysis is twenty (20) cases (10 E&M and 10 procedures) per clinician/service/procedure/modifier. The date range for cases to be evaluated is no less than 30 days and no more than 60 days from the day the review is initiated and assigned, which may be subject to change based on risk.
- If the review is completed by an outside vendor, a Compliance Consultant will review the findings provided. The findings will determine whether a one-on-one meeting with a Compliance Consultant is required. Reviews completed by an outside vendor shall be completed within ten (10) business days.

Review Program Outcome

- Reviews are compliance/quality improvement activities.
- OCCI will identify the root cause of the concern and categorize the findings to determine if any issues found are system related, clinician behavior and documentation failure, or operations and support function gaps.
- OCCI will evaluate the Preliminary Report to verify risk, type of technical assistance necessary, recommend corrective measures to the responsible parties, and verify the most effective action plan.
- OCCI works with the Office of Legal Affairs (OLA) to evaluate any potential overpayments identified in connection with reviewing and monitoring any such overpayment verified will be promptly refunded.

Review Program Follow-Up

- For individual clinician or clinic function(s) achieving an accuracy rate of 70% or greater will be scheduled for future routine monitoring as part of the ECR program. If the **accuracy rate is 69% or less**, then the individual clinician or clinic function(s) will be scheduled for re-review within **6 months**.
- Upon re-review, individual clinician or clinical function(s) achieving accuracy rate of 80% or higher will be scheduled for future routing monitoring as part of the ECR program. If the accuracy rate is 79% or less, then the issue and provider or function will be reported to the Compliance and Corporate Integrity Committee ("CCI") and the provider or function will be placed on focused monitoring until achieving an **accuracy rating of 90% on a monthly basis**.
- Education is provided to all clinicians who score below 80% accuracy and is available to any clinician, regardless of accuracy rating.
- A minimum of 95% accuracy rate is the ultimate goal across all areas reviewed within VUMC.