



DOM Overdue Documentation Policy

The standards for documentation at UW Health and the Department of Medicine are clear. The *measurement* of how well individuals meet those standards is not currently as robust as we would like but it is improving. For the purposes of this policy overdue documentation includes inpatient documentation at UW Hospital and ambulatory documentation at UWHC and UWMF clinics.

Reports in place as of 9/12/11 that will be used for monitoring:

- *UWHC outpatient Esig report*: unsigned dictations in the Esig application for UWHC ambulatory clinics only, posted weekly on Wednesday.
- *UWMF outpatient Esig spot check*: sporadic check by UWMF coding for compliance, posted sporadically
- *UW Hospital inpatient report*: Documentation report showing both missing documentation and missing signatures, weekly on Wednesday
- *UWMF and UWHC outpatient open encounters report* (“missing encounters” report, weekly on Thursday showing encounters open from 7 to 90 days. This will show those who don’t dictate or type a note at both UWMF and UWHC clinics.
- *Future Reports including Inbasket Reports will likely be used as well.*

As we identify individuals in our divisions who are struggling to meet the documentation standards we often run into situations where the “coffee talk” or even more formal divisional discussion do not lead to performance improvement.

The Department bears a responsibility in these rare situations to have a plan in place for improvement in this domain.

From the UWHC documentation policy (6.15):

“Outpatient visits must be documented in the primary University of Wisconsin Hospital and Clinics medical record. Outpatient clinic visits will be directly entered, dictated or written within 48 hours (weekends excluded) of the visit, and should be edited and/or signed within 72 hours of availability. “

DOM Sanctions for Overdue Documentation

The DOM sanctions will only occur after divisional process has failed as determined by the Division Head, Department Chair and the Vice Chair for clinical operations.

1) Divisional Process

- The initial divisional process should include a reminder of the rules and the next steps if not adhered to.
- If the documentation issues continue, the division head will meet with the clinician to discuss the problem and remind the clinician of the Department process and policies.
- If this divisional process fails, the departmental process will be initiated.

2) Departmental Process

- First, the physician will meet with the Vice Chair for clinical operations and discuss prior divisional level action plan and barriers to improvement. At that meeting the Vice Chair will discuss the institutional documentation standards and help develop an action plan for improvement. The Departmental sanctions will be discussed and shared with the physician at that meeting. A written plan will be signed by the Vice Chair and the clinician acknowledging the receipt of the DOM policies and potential sanctions.
- A copy of the action plan and time line for improvement will be shared with the Division Head.
- If the issue continues to occur within the next 12 months the following three levels of sanctions will be initiated.
- **LEVEL ONE:**
 - If after a predetermined date established during the initial step of the departmental process (usually 2-3 weeks later to allow “catch up”), overdue documentation is found to in any of the reports in place at the time the faculty’s division will be charged \$10.00 per chart (e.g. 30 charts = \$300). This bill will be identified as a result of documentation noncompliance.
 - This process will continue to occur weekly and at year-end a final invoice will be provided to the Division Head with the total fine and number of overdue charts.

- This revenue will be withheld from the Division at year-end and the revenue will be retained by the DOM to support quality improvement projects.
- It is expected that this fine will be deducted from the involved faculty's year-end compensation.
- **LEVEL TWO:**
 - If documentation issues persist after 3 weeks of LEVEL ONE fines, the DOM will direct UWMF to withhold the faculty's UWMF paycheck until all documentation is complete.
 - This will lead to a delay in the UWMF paycheck a minimum of 2 weeks even if documentation is immediately completed, due to UWMF payment schedules.
 - The LEVEL ONE fines will continue to be imposed in addition.
- **LEVEL THREE:**
 - If a paycheck hold occurs 3 times in any 12 month period, the faculty will be referred to the DOM Chair for additional disciplinary actions up to and including termination with cause.

Reviewed and approved by the Department of Medicine Executive Finance Committee

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