

POLICY AND PROCEDURE

DEPARTMENT: Quality Improvement	DOCUMENT NAME: Medical Record Review
PAGE: 1 of 21	REPLACES DOCUMENT:
APPROVED DATE: 09/11	RETIRED:
EFFECTIVE DATE: 01/12, 2/15,12/15	REVIEWED/REVISED: 1/14, 3/14, 10/14, 12/14, 10/15, 10/16, 12/16, 3/17, 3/18, 1/19, 1/20
PRODUCT TYPE: All	REFERENCE NUMBER: LA.QI.13

POLICY AND PROCEDURE

SCOPE:

Louisiana Healthcare Connections (Plan) Quality Improvement Department

PURPOSE:

To outline the process by which the Plan monitors its practitioners ensuring medical records are maintained in a detailed and organized manner while maintaining patient confidentiality and facilitating a quality review.

POLICY:

The Plan's minimum standards for practitioner documentation and maintenance of medical records includes: medical record content and organization, ease of medical record retrieval, and maintaining confidentiality for all PHI. These standards are outlined in the Plan Provider Manual and at a minimum, include the following:

- Practitioners must maintain complete and up-to-date medical records at the site where services are provided, including, but not limited to, x-rays, laboratory tests, results, examinations and notes that document all medical services received by the member. These standards apply to all areas of service including inpatient, ambulatory, ancillary, and emergency care
- Medical records must be accurate, legible and maintained in detail consistent with good medical and professional practice which permits effective internal and external quality review and/or medical audit and facilitates an adequate system of follow-up treatment.
- Records must be prepared in accordance with all applicable State and Federal rules and regulations and signed by the medical professional rendering the services
- LDH or its designee shall have immediate and complete access to all records pertaining to the health care services provided to Plan members.
- Providers must maintain confidentiality of medical records in accordance with 42 CFR § 438.224 and 45 CFR Parts 160 and 165 subparts A and E. Medical records should be kept in a secure location and only accessed by authorized personnel. Providers' staff must receive periodic HIPAA and PHI training.
- Practitioners are required to maintain all member records for at least **six (6) ten (10)** years.

Medical record content standards are outlined in the attached medical and treatment record review tools (Attachment A and are disseminated to all practitioners in the Provider Manual. When there are significant changes in the requirements, the revisions

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may be distributed through the Provider newsletter, through direct mailing and the Plan website.

At least annually, Plan will assess network medical record keeping practices against the established standards. Physicians sampled must meet 80% of the requirements for medical record keeping or be subject to corrective action as outlined below.

PROCEDURE:

1. Plan will assess network medical record keeping practices against the established standards. Assessment may be accomplished by any of the following processes:
 - a. Review a sample of records for compliance with HEDIS measures and identify deficiencies
 - b. Review a sample of practitioner records that did not meet HEDIS standards or where other deficiencies were noted
 - c. Review a sample of medical records based on past documentation deficiencies or other criteria.
 - d. Additionally, any practitioner may be chosen throughout the year for focused chart reviews for purposes including but not limited to utilization review, quality management, medical claim review, or member complaint/appeal investigation
2. Plan will conduct reviews at all Primary Care Physicians (PCP) sites with 50 or more linked members and practice sites which include both individual offices and large group facilities. Plan will review each site at least one (1) time during each two (2) year period.
3. The Plan's staff will generate a list quarterly of providers who have not had a medical record review within the last 24 months. The list will contain members that have received services during the selected time period for the review which is determined by the specific areas being reviewed. The list will be comprised of all members currently assigned to the Primary Care Physician (PCP) targeted for review and who have been with the PCP during the entire period of time established as the review period.
4. The Quality Staff will select at least five (5) records per PCP and 3 records per PCP for large group practices (six or more providers in a group) to determine compliance. Member records chosen for review may include, but are not limited to:
 - Members who have had claims for emergency room or in-patient services.

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- Members within a targeted age range or with a specific diagnosis, depending on the focus of the audit (i.e. children to assess components of EPSDT visits, asthmatics to assess compliance with associated clinical practice guidelines).

5. Providers identified for an audit are notified in writing that a medical record review will be conducted (Attachment B1 or Attachment B2). A list of the members selected for review is provided with the notification letter.
6. The staff may schedule the audit at the practitioner's office location or request that medical records or components thereof be mailed, faxed, or scanned to the Plan.
7. Staff conducting the audit are qualified Plan employees or contractors who have signed and dated confidentiality agreements that are on file. HIPAA standards will be maintained throughout the process.
8. The staff performing the review will utilize the Plan's standardized Medical Record Review Tool (Attachment A).
9. On completion of the audit, the Staff reviews preliminary results with the designated office contact person. At this time, the Staff and the office contact person can work together to resolve any inconsistencies or disputes in the audit findings. The contact person and the Staff sign and date the form (Attachment DE) indicating agreement of preliminary results.
10. Upon return to the office, the audit tool is scored. The provider will be notified of the outcome of the review by mail within **30-45 days of the audit**. The **letter documents** (Attachment C and Attachment D) shall include the overall score, any areas of deficiency and a copy of the completed/scored audit tool.
 - a. Elements scoring below 80% are considered deficient and in need of improvement.
 - b. The letter may also suggest action plan for improvement or include model record-keeping aids, such as standardized documentation forms, as applicable.
 - c. **A follow-up audit will be conducted with providers who do not pass with an 80% score to review results and discuss areas requiring improvement.**
Another audit will be completed within the year, requiring two medical record
Audits instead of one over the two year audit period.

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11. The provider will be re-audited 180 days (6 months) from the date of their first audit.

12. The plan will strive to achieve 80% compliance for 90% of our network practitioners. Practitioners whose medical record compliance review score remains below 80% at the follow-up review will be discussed with both the VP of Network and Contracting and a Plan Medical Director for further action. Secondly, Practitioners who refuse to provide requested medical records for review after three request within the quarter will be discussed with both the VP of Network and Contracting and a Plan Medical Director for further action. Actions recommended may include but are not limited to:

- a. Referral to the Plan Quality Assessment Performance Improvement Committee (QAPIC) and/or Provider Engagement Committee with oversight by a Plan Medical Director
- b. Review of contract for possible assessment for network limitations, financial penalties or possible termination from the network

12. 13. Medical record review results are filed in the Quality Improvement department and shared with the Credentialing department to be considered at the time of re-credentialing.

14. An aggregate summary of medical record reviews completed are reported monthly to the Performance Improvement team and quarterly to the Plan QAPIC and LDH. A summary and analysis of the results is included in the Plan's QAPI Annual Evaluation.

13. 15. Medical record review results are trended by the Quality Improvement department to determine plan-wide areas in need of improvement. Issues may be addressed via network-wide and/or provider-specific education to improve elements of medical record documentation.

REFERENCES

DHH CCN-P RFP, Section 15.6
DHH MCO RFP 2014, Section 8.2.2.9

ATTACHMENTS

Attachment A Medical Record Review Tool (PCP)

Attachment B1 Notice of Medical Record Audit [Letter \(No Access\)](#)

Attachment B2 Notice of Medical record Audit Letter (Access)

Attachment C Notice of Medical Record Review Findings

Attachment D [Notice of Medical Record Audit Score - CONFIRMATION OF ONSITE COMPREHENSIVE MEDICAL RECORDS REVIEW](#)

Attachment E Confirmation of Onsite Comprehensive Medical Records review

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[**Attachment G MRR Score letter Template**](#)
[**Attachment I 2020 MRR Audit Tool Questions**](#)
[**Attachment J 2020 MRR CAP Process**](#)
[**Attachment K 068 LHC MRR Strategy**](#)

DEFINITIONS:

High-volume specialists may be defined or identified by one of the following:

- Specialists located in an expected high-volume geographic area or in high-volume disciplines (OB/GYN), or both
- Available prior authorization data
- Certain types of specialists most likely to provide services to the largest segment of the membership (OB/GYN)

REVISION LOG

REVISION	DATE
Removed that standards are on Plan website. Changed QI Coordinator to PCMH Staff. Added that offices may fax or scan records. Changing tool by taking out HEDIS measures and point values. Changed from 15 to 30 days after audit, provider will receive copy of score. Revised actions on #12. Added that summary will be reported monthly to PIT. Revisions to follow up audit process.	1/2014
Added: the plan will strive to achieve 80% compliance for 90% of our network.	3/2014
The PCMH Staff will select at least five (5) to ten (10) records for sites with a panel <500 and 3 records per provider for large group practices (six or more providers in a group) for sites with a panel ≥500.	10/2014
Added to attachments A, B and C: Documentation of emergency and/or after-hours encounters and follow-up; Documentation of advance directives, as appropriate Added attachment D	12/2014
Added language to include the LMHP Medical and Treatment Record Review Added Attachment A1	9/15
Added: Secondly, Practitioners who refuse to provide requested medical records for review after three requests within the quarter will be discussed with the Plan Chief Medical Director for further action. Changed DHH to LDH	10/16
Clarified language in Medical Record Documentation Standards to ensure medical history is captured and maintained for patients from the first visit.	12/16
Replaced PCMH staff with staff Added VP of Network and Contracting to Plan Medical Director as reviewers of practitioners that fall below 80%	3/17
Remove all reference to LMHP and Behavioral Health Medical Record and Treatment Reviews Change Peer Review Committee to Provider Engagement Committee	3/18

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Removed Attachment A1 Updated Attachment A, Attachment B, and Attachment C	
Removed all reference to panel size (ie. 500 members etc), Removed the need to review OB/GYNs operating as PCPs and Decreased the minimum number of records to be reviewed for solo practitioners	1/23/2019
<ul style="list-style-type: none"> • <u>Attachment A 068 LHC MRR Stratey revised and renamed Attachment K.</u> • <u>Attachment A Medical Record Review Tool (PCP) revised.</u> • <u>Attachment B revised and renamed Attachment B2. Added Attachment B1. Attachment J MRR CAP Process removed and renamed Attachmennt J 2020 CAP Process.</u> • <u>Attachment B MRR 23 Standards Letter Template,</u> • <u>Attachment F and H removed (duplicated).</u> • <u>Attachment C 2019 MRR Audit Tool Questions removed, replaced with Attachment I. Attachment C (cont) revised and renamed Attachment D, Attachment D renamed Attachment E.</u> • <u>Added The provider will be re-audited in 180 days (6 months) from the day of the first audit.</u> • <u>Changed Addedded “provider will be notified of outcome of review from 30 days to 30-45 days”.</u> • <u>Revised practitioner record retention from (6) to (10) years of last treatment</u> • <u>Changed Attachment B Revised “Providers identified for an audit are notified in writing that a medical record review will be conducted (Attachment B) to (Attachment B1 or B2).</u> <u>Changed Revised “The contact person and staff sign and date the form (Attachment D) to (Attachment E) indicating agreement of preliminary results.</u> • <u>Revised the letter (Attachments C and D.) to (Attachmennt C and Attachment D) shall include the overall, any areas of deficiency and a copy of the completed/score audit tool.</u> • <u>Procedure step number 11 moved under step number 10 and labeled c. Remaining steps renumbered.</u> 	1/20/2020

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POLICY AND PROCEDURE APPROVAL

The electronic approval retained in Archer GRC, Centene's P&P management software, is considered equivalent to a physical signature.

Director of Quality Improvement: _____ Signature on file

Sr. VP Medical AffairsChief Medical Officer: _____ Signature on file

Attachment A

Medical Record Review Tool

Responses: Met (M)=1, Needs Improvement (NI)=0.5, Not Met (NM)=0, Not Applicable (NA)=1
Physician/Clinic Medical Record Review Tool

Attachment A

Attachment A

Attachment A

Medical Record Review Tool

[Click here to enter date](#)

Date

Provider Name of Provider

Provider Street Address

<City>, <State> <Zip Code>

Dear Provider;

! Because we understand that your patients comes first and foremost, Louisiana Healthcare Connections values the care you provide for our members. As part of our Quality Improvement Program, and in compliance with State contractual requirements, Louisiana Healthcare Connections routinely evaluates our members’ the Medical Records in an effort to ensure quality services are being rendered. We are required to evaluate the medical record practices of our primary care providers (PCPs) and/or practices sites practices of its Primary Care Providers (PCP) with fifty or more members assigned and /or linked bi-annually to their care. This includes individual offices and large group facilities. A copy of the Medical Records standards adopted by Louisiana Healthcare Connections and used to perform the review is included in your Provider Manual and is also available online at www.LouisianaHealthConnect.com.

Please read this letter and all attachments in their entirety to ensure you are aware of ALL documentation being reviewed.

Enclosed is a list of selected members who were seen by you during the previous year <YEAR> and whose medical records will be reviewed. We will utilize the Medical Records standards adopted by Louisiana Healthcare Connections to perform the review. These standards can be accessed at www.LouisianaHealthConnect.com and are also enclosed for your reference. Once review is completed and results have been tabulated, you will receive an explanation letter of the results and consultative feedback as needed or requested. In the coming days, we will be contacting your office to schedule a mutually acceptable date and time for review of your previous year Medical Records. The average length of time to conduct our review is approximately 2-3 hours. While it is not necessary for you or your office staff to be present during the entire review, I would like a few minutes at the end of the review to summarize preliminary findings.

A roster of 3-5 randomly selected members whose records will be reviewed is enclosed. You will be given verbal feedback at the conclusion of the review followed by a formal, summary report. Please submit the requested medical records via fax or mail within 14 calendar days from receipt of this letter. Please note that we cannot accept requested records on any portable storage device such as CDs or USB drive.

As a reminder, protected health information (PHI) that is used or disclosed for purposes of treatment, payment or health care operations is permitted Medical Records and associated comments submitted for review are “Privileged and Confidential” in accordance with in accordance with HIPPA Privacy Rules (45 CFR 164.506) and does not require consent or authorization from the member/patient. Medical Records and associated comments submitted for review are “Privileged and Confidential”

Please contact the Abstractor listed below if you have any questions:

Phone

Fax

Mail

Attachment B2

<p><Abstractor> 1-866-595-8133 ext. XXXXX <Cell></p>	<p><u>Louisiana Healthcare</u> <u>Connections</u> <u>ATTN: <Abstractor></u> 1-866-704-3070</p>	<p><u>Louisiana Healthcare</u> <u>Connections</u> <u>Quality Department</u> <u>Attn: <Abstractor></u> <u>8585 Archives Blvd., Suite 310</u> <u>Baton Rouge, LA 70809</u></p>
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We appreciate your participation and cooperation with our quality improvement activities. As always, our goal is to partner with you to obtain the highest quality of care while ensuring the safety of your patients-our members.

Sincerely,

Andrea Harrison, Project Coordinator II

~~Compliance Standards as well as contractual agreements between Louisiana Healthcare Connections and its providers. Louisiana Healthcare Connections shall strictly maintain the confidentiality of all Medical Records and only provide access to authorized persons in accordance with the following:~~

- ~~• Medical Records will be used only for the purpose of this request;~~
- ~~• Medical Records will be kept in a secure location;~~
- ~~• Medical Records will be appropriately destroyed when they are no longer needed for this request, and~~
- ~~• Medical Records will not be further disclosed or otherwise distributed.~~

~~We ask for your cooperation with this request and appreciate your support. If you would prefer to fax Medical Records to us please do so at least (5) days prior to the end of this month.~~

Respectfully,

Your Medical Records Project Coordinator, Quality Improvement

Contact : (866)595-8133, ext. 84716

Fax : (866)704-3070

Attachment B2

Enclosure(s): Medical Records Documentation Standards, Confirmation of Comprehensive Onsite Medical Records Review, Member List.

MEDICAL RECORDS DOCUMENTATION STANDARDS

1. Each and every page in the Medical Record contains the patient's name or ID number.
2. Personal/biographical data includes date of birth, sex, legal guardianship, address, employer, home and work telephone numbers, and marital status as well as assessment of cultural and/or linguistic needs such as primary language spoken, translation needs **or communication assistance**, deaf/blind, etc.
3. All entries in the Medical Record contain author identification **including name, credentials, initials, and correlating signatures**.
4. All entries are dated and **signed, or dictated by the provider rendering care**. ~~services contain start and end times.~~
5. The Medical Record is legible to someone other than the writer.
6. Significant illnesses and medical conditions are indicated on a problem list **for all past and current diagnoses**.
7. Any allergies (medication, food and/or tactile) and adverse reactions are prominently noted in the Medical Record **in a uniform location**. If the patient has no known allergies or history of adverse reactions, this is appropriately noted in the Medical Record **as NKA or NKDA**.
8. Medication List includes instructions to member regarding dosage, initial date of prescription, possible side effects and number of refills.
9. Past medical history (for patients seen three or more times) is easily identified and includes serious accidents, operations or illnesses, **discharge summaries and ER encounters**. For ~~patients~~ **children and adolescents** age 18 years or younger, past medical history relates to any prenatal care, birth, operations or childhood illnesses.
10. For patients **101** years and older, there are appropriate notations concerning use of any **cigarette tobacco**, alcohol or substance abuse (for patients seen three or more times **substance abuse history should be queried**).
11. The history and physical exam records incorporate subjective and objective information for presenting complaints. Clinical findings and evaluations for each visit are documented in the Medical Record.
12. Patients 2 years and younger have had a lead screening ordered.
13. Encounter forms or notes have a notation, when indicated, regarding follow-up care, calls or visits. The specific time of return is noted in weeks, months, or **as needed Pro re nata** (P.R.N.).

Attachment B2

14. Unresolved problems from previous office visits are addressed in subsequent visits and annotated in Medical Record.
15. Documentation of emergency and/or after-hours encounters and follow-up;
16. If a consultation is requested, there is a note from the consultant in the Medical Record.
17. Consultation, lab, imaging/diagnostic reports, ancillary and therapeutic reports filed in the chart are initialed by the ordering practitioner to signify review. If the reports are presented electronically or by some other method, there is also representation of review by the ordering practitioner. Consultation and abnormal lab and imaging study results have an explicit notation of follow-up plans in the Medical Record.
18. An up-to-date immunization record has been established initiated for pediatric patients 18 years or younger, or an appropriate history is has been made in the chart Medical Record for adults. patients 18 years or older.
19. EPSDT-specific requirements include: comprehensive health history, developmental history, unclothed physical exam, vision, hearing and dental screening, appropriate immunizations, appropriate lab testing including lead screening, and health education and anticipatory guidance.
20. Medical Records are stored securely with access limited to authorized personnel and easily retrievable upon request. All patient information is kept confidential.
21. Medical Record format is organized and consistent.
22. All consent forms are signed and dated as applicable.
23. Evidence that Documentation of an advance directives has been offered to adults 18 years of age or older, as appropriate

Attachment C
Notice of Medical Record Review Findings

Medical Record Review Summary by Facility

Date of audit	(All)	
Facility	Client Provider #	Provider Name
	Row Labels	(All)

Primary Contact

Facility Overall Score

Audit Completed By

Standard	Total Points	Possible Points	Percentage by Standard
Standard #1 Each and every page in the record contains the patient's name or ID number			
Standard # 2 - Personal/biographical data (see Documentation Standards)			
Standard #3 All entries in the medical record contain author identification including name, credentials, initials and correlating signatures			
Standard #4 All entries <u>must be dated and signed, or dictated by the provider rendering care have date and services also have begin and end times</u>			
Standard #5 The <u>Medical</u> record is legible to someone other than the writer <u>and in ink/electronic</u>			
Standard #6 Significant illnesses and medical conditions are indicated on a <u>problem List for all past and current diagnoses</u>			

<p>Standard #7 <u>Medication</u><u>Any</u> allergies (<u>medication, food and/tactile</u>) and adverse reactions are prominently noted in the <u>Medical Record in a uniform location</u>. If the patient has no known allergies or history of adverse reactions, this is appropriately noted in the <u>Medical Record as NKA or NKDA</u>.</p>			
<p>Standard #8 Medication List includes instructions to member regarding dosage, initial date of prescription, <u>possible side effects</u> and number of refills.</p>			
<p>Standard #9 Past medical history (see Documentation Standards)</p>			
<p>Standard # 10 <u>Health education provided including</u> <u>f</u>or patients <u>10+</u> years and <u>over</u><u>older</u>, there are appropriate notations concerning use of <u>cigarettes</u><u>tobacco</u>, alcohol, <u>and</u><u>or</u> substance abuse (for patients seen three or more times <u>substance abuse history should be queried</u>).</p>			
<p>Standard #11 The history and physical exam records <u>appropriate incorporate</u> subjective and objective information for presenting complaints. <u>Clinical findings and evaluations for each visit are documented in the Medical Record</u></p>			
<p>Standard #12 <u>Children</u><u>Patients</u> <u>2 years</u> and <u>under</u><u>younger</u> have had a lead screening ordered</p>			
<p>Standard #13 Encounter forms or notes have a notation, when indicated, regarding follow-up care, calls, or visits. The specific time of return is noted in weeks, months, or <u>as needed (PRN)</u>.</p>			
<p>Standard # 14 Unresolved problems from previous office visits are addressed in subsequent visits <u>annotated in the Medical record</u>.</p>			
<p>Standard # 15 Documentation of emergency and/or after-hours encounters and follow-up;</p>			
<p>Standard # 16 If a consultation is requested, there is a note from the consultant in the <u>Medical Record</u>.</p>			
<p>Standard #17 Consultation, lab <u>and</u><u>imaging</u><u>/diagnostic reports</u>, <u>ancillary</u> and <u>therapeutic</u> <u>reports</u> <u>filed</u> <u>in</u> <u>the</u> <u>chart</u> <u>are</u> <u>initialed</u> <u>by</u> <u>the</u> <u>ordering</u> <u>practitioner</u> <u>signify</u> <u>review</u>. If the reports are presented electronically or by some other by some other method, there is also represenatation of review by the</p>			

<p><u>ordering practitioner. Consultation and abnormal lab and imaging study results have an explicit notation of follow plans in the Medical record (see Documentation Standards)</u></p>			
<p><u>Standard #18 An up-to-date immunization record has been established for pediatric patients initiated for children, or an appropriate history has been is made in the medical record chart for adults.</u></p>			
<p><u>Standard # 19 EPSDT specific requirements (see Documentation Standards)</u></p>			
<p><u>Standard # 20 Medical Records are stored in a securely with access limited to manner that allows easy retrieval by authorized personnel and easily retrievable upon request. All patient information is kept confidential only.</u></p>			
<p><u>Standard #21 Medical Record format is organized and consistent</u></p>			
<p><u>Standard #22 All Consent forms are signed and dated as applicable</u></p>			
<p><u>Standard #23 Evidence that an Documentation of advance directives, has been offered to adults 18 years of age or older as appropriate</u></p>			

Provider signature

Date

Attachment **DC (cont.)**
Notice of Medical Record Review Audit Score

Date

Provider Name

Address

City, State, Zip code

Dear Provider,

Louisiana Healthcare Connections recently completed a compliance audit of your Medical Records practices in _____. In general, Medical Records were maintained in a detailed and organized manner. **Your overall score for Medical Records audited is XX%.**

Enclosed are detailed audit findings for your review. Areas scoring below 80% are considered "deficient and in need of improvement." If the overall score is below 80%, please sign and date the enclosed *Completed Medical Record Review Summary* and fax to Louisiana Healthcare Connections at **(866)704-3070**.

Because the overall score is less than 80%, you are required to complete a Corrective Action Plan (CAP). This CAP should be returned to Louisiana Healthcare Connections within 10 days of receipt of this letter and address all areas that scored less than 80%. You will have 60 days to fully implement your CAP. Louisiana Healthcare Connections will conduct a re-audit 6 months from the date of the original Medical Records/Medical Records Treatment audit in order to monitor progress towards improvement. If the overall score remains below 80% upon re-audit, the findings will be presented to our Senior Vice President of Medical Affairs for further action. (REMOVE THIS PARAGRAPH IF SCORE IS PASSING)

If you have any questions regarding your Medical Records/Medical Records Treatment audit findings or overall score, I may be reached directly by calling **(866)595-8133 ext. 84716**.

Respectfully,

Medical Record Project Coordinator

Quality Improvement Department

Attachment:

Completed Medical Record Review Summary

Attachment **D E**

(Attachment **D E**)

CONFIRMATION OF ONSITE COMPREHENSIVE MEDICAL RECORDS REVIEW

Date: _____

Provider: _____

Your comprehensive Medical Records review has been completed. Preliminary results indicate your score to be ____%. The Louisiana Healthcare Connections staff member completing this review has given you (or your designated office contact person) the opportunity to resolve any inconsistencies or disputes in the review findings while on site. You will receive a full, formal report by mail within 30 days of this review. The report you receive will include the overall score, any areas of deficiency and a copy of the completed/scored review tool. Your signature below indicates you have been given the opportunity to participate in this process and are in agreement with the preliminary results.

Comments:

Signature:

Louisiana Healthcare Connections Staff

Provider or Provider Designee