


Name of Policy: <u>Medical Record Delinquency Policy</u> Policy Number: 3364-87-03 Approving Officer: Chief of Staff Chief Executive Officer Responsible Agent: Medical Staff Office, Health Information Management, Chairs Scope: All University of Toledo Campuses	 Effective Date: 03/01/2021 Original Effective Date: 04/12/00
<input type="checkbox"/> New policy proposal	<input type="checkbox"/> Minor/technical revision of existing policy
<input checked="" type="checkbox"/> Major revision of existing policy	<input type="checkbox"/> Reaffirmation of existing policy

(A) Policy statement

A medical record delinquency occurs when the required contents of the medical record have not been completed within a specified timeframe resulting in an incomplete medical record.

(B) Purpose of policy

To define medical record completion delinquency and set forth the process that will be followed for the notification and suspension process for delinquent medical records.

(C) Procedure

- (1) Delinquent Record defined. A delinquent medical record is defined as any chart lacking the signature(s) or documentation necessary to bill the admission or complete the medical record within the time frames established in the Documentation Standards policy (#3364-87-42):

Document Type	Policy section	Expectation of availability	Expectation for provider signature
Consultation	3.f. ii.1	Within 24 hours of completing consultation	Within 24 hours
Discharge Summary	3.g. vi	No later than 24 hours post discharge	No later than 24 hours post discharge
History & Physical for admission	3.d. ii.1	Within 24 hours of admission	Within 24 hours of admission
History & Physical prior to surgery	3.d. ii.4	Day of surgery	Day of surgery
Progress Note	3.e.iv	Daily	Within 24 hours
Operative/Procedure Report	6.a	Within 24 hours of conclusion of surgery	10 days after conclusion of surgery
Verbal/Telephone Orders	6.e. i.3	N/A	ASAP but no longer than 30 days post discharge

- (2) Responsibility. The attending physician has final responsibility to ensure all records are complete. Medical records must be completed using University of Toledo electronic applications. Attending physicians and residents must complete all available records prior to leaving for vacation or extended leave.
- (3) Delinquent Medical Records Notification
 - (a) Health Information Management (HIM) will notify providers of delinquent medical records via email. Additionally, providers are notified of delinquent medical records within the inpatient clinical portal.
- (4) Delinquent Medical Records and protocol for suspension
 - a. A medical record that is delinquent for 30 days post discharge is at risk for voluntary suspension of privileges.
 - b. Each weekday, a deficiency report will be run for records older than 30 days. This constitutes the list of providers at risk for suspension. The provider and the service chief will be notified.
 - c. A delinquency 31 days post discharge that has been verified by the Chief of Staff (COS) and the Chief Medical Officer (CMO) will result in the voluntary suspension of the practitioner's privileges in accordance with Article 3.1.4 of the medical staff bylaws
 - i. The Medical Staff office will also receive a copy of the letter for the hospital files.
 - ii. The Medical Staff Office will notify admitting and OR via fax of the physician's suspension.
 - d. The suspended privileges will be automatically restored upon completion of the medical records and compliance with medical records policies.
 - e. A provider who has three (3) suspensions in a rolling twelve (12) month period will be terminated from the medical staff if a fourth (4th) suspension is received.
 - f. This suspension of privileges shall not apply to patients admitted or already scheduled at the time of suspension, to emergency patients, or to imminent deliveries. During suspension, the provider will not be able to provide NEW care or schedule a NEW procedure. APPs will not be able to provide any care. If the provider violates the rules of suspension, this could be grounds for termination. Any violation of suspension will be reported to the COS and CMO.
 - g. For the purpose of enforcing the suspension, justified reasons for delay in completing medical records may include:
 - i. The provider has a personal illness or has a family emergency;
 - ii. The provider is out of the office for vacation;

- iii. The provider is on military deployment;
- iv. The provider is out of the country; or
- v. Clinical documentation system malfunction.

(5) Protocol for Termination from the Medical Staff

- a. Providers will be terminated from medical staff membership and/or privileges if either of the following occurs:
 - i. Four (4) suspensions within a rolling twelve (12) month period, or
 - ii. One (1) prolonged suspension lasting greater than six (6) weeks
- b. On a weekly basis, the COS and CMO will be notified of the provider status to allow ample time for any warnings to be given to the provider.

(6) Protocol for Reinstatement of Medical Staff Membership and/or Privileges

- a. Once terminated from Medical Staff membership and/or privileges for delinquent medical records, the provider must reapply as an initial applicant in order to request reinstatement to the Medical Staff or for the granting of privileges.

<p>Approved by:</p> <p>/s/ _____ Date <u>03/13/2021</u></p> <p>Andrew Casabianca, MD Chief of Staff</p> <p>/s/ _____ Date <u>03/12/2021</u></p> <p>Richard Swaine Chief Executive Officer</p> <p><i>Review/Revision Completed by: Medical Executive Committee</i></p>	<p>Policies Superseded by This Policy:</p> <ul style="list-style-type: none"> • <i>MS-003 Medical Record Delinquency Policy</i> <p>Review/Revision Date:</p> <p>09/13/00 12/13/00 06/13/01 09/11/02 11/13/02 02/12/03 11/19/03 05/12/04 03/08/05 07/13/05 06/13/07 02/23/11 11/30/12 04/01/16 08/01/2016 08/01/2019 02/15/2021</p> <p>Next review date: 02/15/2024</p>
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