Today’s Presenters and Purpose of Presentation

- **Emily Stinson**, Healthcare Policy and Payment Methods
- **Sharon Brosio**, Medical Coding Compliance

We’re here today to gather input and identify any potential barriers to the implementation of L&I’s proposed cloning policy.
What is cloning?

- Cloning documentation, also referred to as copy-and-paste, is the practice of carrying forward previously documented information from another patient visit.

- This can be done across patients (copying information from one patient’s encounter to another) or across encounters for the same patient.

- As a result, encounters appear to be identical or substantially similar from visit to visit or across patients.
What issue are we trying to solve with this policy?

Cloning medical records poses a risk to patient care, claims management, and medical record integrity from a coding perspective. Specifically, this practice may result in:

- Redundancy
- Over documentation
- Accidental misrepresentation of what was actually performed in a given visit
What are the effects of cloned documentation?

Ultimately, the effects of cloned documentation may include:

- Patient care could potentially be compromised when/if another provider reviews the patient records
- Claim managers may incorrectly deem patient care is palliative in nature
- Bill payment staff may be unable to determine how to appropriately reimburse services
Example – Please review the handout

Would you feel comfortable if asked to provide input on this patient’s care?

What questions would you have if you saw these records?

Is this care palliative or curative?

How would you determine what was performed on each of the dates of service?

How would you suggest L&I determine the appropriate level of office visit to pay?
Yes, cloning is not an issue unique to Labor & Industries. Cautions regarding cloning have been issued by other entities including:

- OIG
- CMS
- AAPC
- AHIMA

Formal policies have been issued by:

- Noridian
- Moda Health
- And others
Definition:

Cloning – also known as copy-and-paste, is the act of carrying forward information from one medical record to another. This includes carrying forward information from one date of service to another for the same patient as well as copying information from one patient into the medical record of another patient. The wording from each medical record is worded exactly the same or substantially similar to another encounter.
Proposed Policy Language

Policy:

The insurer will consider cloned documentation a misrepresentation of the services provided on a given day. Cloned information will not be used in determining the level of service provided, which may result in recoupments or denial of services.
Questions for the group

Is the policy language clear?

Is there anything you think should be added or specifically excluded?

Do you have recommendations about how to implement and communicate this change?