DEPARTMENT: Regulatory Compliance Support	POLICY DESCRIPTION: CDI Orientation and Training
PAGE: 1 of 3	REPLACES POLICY DATED: 9/1/11, 9/1/13, 2/1/19
EFFECTIVE DATE: May 1, 2019	REFERENCE NUMBER: REGS.DOC.003
APPROVED BY: Ethics and Compliance Policy Committee	

SCOPE: All full-time and part-time personnel responsible for performing, supervising or monitoring Clinical Documentation Improvement (CDI) services including, but not limited to:

CDI Director/Manager/Specialists   Administration
Corporate Regulatory Compliance Support   Physician Advisors
Ethics and Compliance Officer   Nursing
Facility/Health Information Management Service Center (HSC)
Health Information Management
Parallon Business Performance Group HIM
Case Management/Quality Resource Management
Approved CDI Vendors

PURPOSE: To orient all new CDI personnel to Company and facility CDI policies and procedures, tools and resources, and education and training programs.

POLICY: The Company will provide an orientation and training session to all new CDI personnel involved in the performance of the CDI function. The orientation process will include review of policies, procedures, tools and resources provided by the facility and Company and ensure such personnel obtain an understanding of HCA Healthcare's philosophy of a balanced CDI program. CDI is performed for clarification of conflicting, imprecise, incomplete, illegible, ambiguous, or inconsistent documentation within the medical record, prior to patient discharge.

Completion and documentation of CDI education and training requirements must be met within 90 days of employment or transfer into a CDI position. Applicable training requirements are outlined in the CDI Continuing Education Requirements Policy, REGS.DOC.004. Refer to specific policies for the applicability and education requirements.

For newly-purchased facilities, timelines for completion of CDI education and training requirements will be the same as defined in this policy unless otherwise directed by the Company's Acquisition/Due Diligence team.

PROCEDURE:
1. All new employees involved in the CDI process or current employees transitioning to a CDI position will review the following policies and resources as applicable to the treatment setting, prior to performing any CDI function:
   a. The Clinical Documentation Improvement (CDI) - Implementation Requirements Policy, REGS.DOC.001
   b. The Query Documentation for Clinical Documentation Improvement (CDI) & Coding - Compliance Requirements Policy, REGS.DOC.002, with corresponding review of the query handbook and the query online courses
   c. The Company's Special Coding Practices on ICD-10-CM Code J15.6 Policy
   d. AHIMA CDI Practice Brief - Located on Atlas

    e.   AHIMA CDI Ethical Standards - Located on Atlas
    f.   All facility-specific CDI policies and procedures

2. The required resources will be reviewed, as applicable to position responsibility, and made available to the CDI staff prior to the CDI function. REGS.DOC.004 outlines the version of references that should be available and whether access can be hardcopy and/or electronic. Publications include:
    a. Regs Helpline Communications- Located on Atlas
    b. Medical Dictionary
    c. Medical Acronyms and Abbreviations List
    d. Anatomy and/or Physiology Book/Information
    e. Drug Reference Tool (*e.g.*, *Clinical Pharmacology Drug Reference*)
    f. Disease Process Manual, (*e.g.*, *The Merck Manual*)
    g. DRG Expert and or DRG Desk Reference

3. All CDI Specialists will be given an orientation to all applicable computer systems (*e.g.*, 3M, Meditech) prior to performing the CDI function.

4. Within two weeks of employment:
    a. The employee will be oriented to the Regs Helpline and Regs Atlas website.
    b. Guidelines for use and phone numbers for the Ethics Line will be provided to the employee.
    c. The remainder of the Company's Ethics and Compliance Policies and Procedures Manual/Atlas site along with any other HCA Healthcare policies applicable to job responsibilities will be reviewed and acknowledged.

5. Within 90 days of employment:
    a. An overview and explanation of the appropriate use of the applicable reports used by the facility to monitor quality and quantity of CDI function will be reviewed.
    b. Documentation of the training for full-time and part-time employees must be completed, as required by the CDI Continuing Education Requirements Policy, REGS.DOC.004, including mandatory CDI education requirements as outlined in the consolidated listing in the current year's document, Regs Education Listing found on Atlas, and must be entered in the HealthStream Learning Center (HLC).
    c. The CDI Director or direct supervisor will complete the attached orientation checklist.

6. Documentation of the completed orientation checklist must be retrievable and able to be accessed, when requested.

7. The facility must be able to provide evidence of compliance with this policy, when requested, to Regulatory Compliance Support, Parallon Business Performance Group HIM, the facility ECO, and/or other corporate departments as needed.

8. The Facility Ethics and Compliance Committee is responsible for implementation of this policy within the facility.

9. Compliance with this policy will be monitored by the Corporate Regulatory Compliance Support Department, Parallon Business Performance Group HIM, and/or Internal Audit.

For questions regarding this policy, please contact the Regs Helpline.

REFERENCES:

1. The Clinical Documentation Improvement (CDI) - Implementation Requirements Policy, REGS.DOC.001
2. The Query Documentation for Clinical Documentation Improvement (CDI) & Coding - Compliance Requirements Policy, REGS.DOC.002
3. HCA Query Handbook
4. HealthStream Online Query Courses - Query Policy Course - HCA-COM-COD-531-WB and Query Form Course - HCA-COM-COD-530-WB
5. HCA Coding Practices on ICD-10 -CM Code J15.6 Policy
6. AHIMA CDI Practice Brief
7. AHIMA CDI Ethical Standards
8. CDI Continuing Education Requirements, REGS.DOC.004

Attachment A
Orientation Checklist

Scope: All full-time and part-time employees and solo practitioners responsible for performing the CDI function must have an orientation checklist completed.

Directions: The supervisor and/or the CDI Specialist (CDIS) should date and initial under the appropriate column for each designated task. The supervisor will indicate NA (not applicable) for any resource not reviewed because it is not applicable to position responsibility. For any items determined NA, written documentation denoting the reason the item was NA must be provided.

CDIS Name: _____

Hire/Transfer Date: _____

CDIS Start Date: _____

Prior to Beginning the CDI Process		Supervisor	CDIS	Date	N/A
1	Orientation to the facility				
2	Orientation to the department				
3	Review of The Clinical Documentation Improvement (CDI) – Implementation Requirements Policy, REGS.DOC.001				
4	Review of The Query Documentation for Clinical Documentation Improvement (CDI) & Coding – Compliance Requirements Policy, REGS.DOC.002, with corresponding review of the query handbook and the query online courses				
5	Review of The Company's Special Coding Practices on ICD-10 -CM Code J15.6 Policy				
6	Review of the AHIMA CDI Practice Brief- Located on Atlas				
7	Review of the AHIMA CDI Ethical Standards- Located on Atlas				
8	Review of the Regs Helpline Communications- Located on Atlas				
9	**Location of following resources:**				
9a	ICD-10 –CM/PCS Integrated Code Book				
9b	Medical Dictionary				
9c	Medical Acronyms and Abbreviations List				
9d	Anatomy and/or Physiology Book				
9e	Drug Reference Tool, Clinical Pharmacology Drug Reference				

9f	Disease Process Book, The Merck Manual				
9g	DRG Expert and/or DRG Desk Reference				
10	Orientation to all applicable computer systems				

Within Two Weeks of Employment		Supervisor	CDIS	Date	N/A
1	Name and phone number of Corporate Regulatory Compliance Support contact person.				
2	Guidelines and contact information, including phone number as applicable, for Ethics Line, and Regs Helpline.				
3	Review of the remainder of the REGS CDI Policies in the Ethics and Compliance Policy and Procedure Manual and/or E&C Atlas website along with any other HCA policy applicable to job responsibilities.				

Within 90 Days of Employment		Supervisor	CDIS	Date	N/A
1	Overview of reports used to monitor CDI.				
2	Documentation of CDI training as required by REGS.DOC.003 including mandatory CDI education requirements as outlined in the consolidated listing in the current year's document, "Regs Education Listing" found on Atlas.				
3	Completion of the orientation checklist.				

CDIS' Name: _____

CDIS' Signature: _____

Supervisor's Signature: _____

Supervisor's Title: _____

Date Completed: _____

This form must be maintained in the Employee's Department Education File