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# CodingAlert

**Coding & Audit Pitfalls:**  
Best Practices to Avoid Compliance Issues

July 2019

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DATES OF SERVICE	PROCEDURE CODE	
05/21/10-05/21/10	82272	PU
05/21/10-05/21/10	94010	PULMO
05/21/10-05/21/10	94375	CARDIOVASCULAR SE
05/21/10-05/21/10	93000	VENIPUNCTURE
05/21/10-05/21/10	36410	

## Copy and Paste Function in Clinical Documentation

Copying clinical documentation from one medical encounter to another (cloning) may be helpful in a busy healthcare facility to reduce overall time and increase productivity. However, cloning comes with some significant risks – so significant that some facilities have banned the use of cloning completely.

The Centers for Medicare & Medicaid Services (CMS) has provided limited guidance to Medicare contractors on EHR fraud vulnerabilities regarding copied language and over-documentation. It is vital that each patient visit should demonstrate that it is unique in nature. Copying clinical documentation may lead to a higher code and not accurately reflect actual services provided. Hence it is imperative to keep the authenticity of the record to avoid fraud, waste and abuse.

Cloning can also create significant legal risk in the event of malpractice lawsuits. It can be difficult to impossible to defend a medical record in which in appropriate cloning is evident.

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### Be especially alert for inappropriate cloning in:

- The History of Present Illness (HPI)
- Review of Systems (ROS)
- Assessment and Plan (A/P) sections of the chart

### When cloning, if the facility allows the practice, the provider should indicate:

- What is being pulled forward from previous notes.
- What is new information to account appropriately on the services performed during that visit. For example, if the provider indicates that the information is copied by inserting quotation marks around the documentation and notes “copied from previous visit note,” and proceeds to add new content, this would constitute as an appropriate use of the cloning functionality.

To inquire about coding education, medical record documentation or compliance auditing, contact Harriett Wall by calling 207-613-2992 or email [HWall@LW-Consult.com](mailto:HWall@LW-Consult.com).

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## Copy and paste function attributes to be aware of:

- **Truncation** - curtailing vital information that supports or impacts medical treatment.
- **Reliability** - pertinence and integrity of forwarded information as it pertains to current encounter
- **Patient safety** - vital, lab results, wrong patient. If diagnostic information is pulled forward, different clinical information and updates should be reported.

## How to manage cloning:

- Create and use internal organization policies which outline documentation integrity standards. Implement systematic checks and balances that would include auditing.
- If inappropriate cloning is found, corrective action(s) should be taken potentially including placing provider(s) on billing hold status so that documentation and claims can be corrected prior to submission to payors.

- Regularly provide training showing appropriate (if allowed at the facility) and inappropriate uses of cloning derived from facility-specific documentation.

## Sources:

<https://www.govinfo.gov/content/pkg/FR-2018-11-23/pdf/2018-24170.pdf>

To minimize costly medical billing and coding errors, it's important to stay up to date on the requirements. LW Consulting, Inc, can assist you with coding education, medical record documentation and/or compliance auditing.

[Explore Our Services](#)

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