<table>
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<th>DEPARTMENT: Regulatory Compliance Support</th>
<th>POLICY DESCRIPTION: CDI Continuing Education Requirements</th>
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<td>REPLACES POLICY DATED: 9/1/11, 9/1/13</td>
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<td>EFFECTIVE DATE: February 1, 2019</td>
<td>REFERENCE NUMBER: REGS.DOC.004</td>
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<td>APPROVED BY: Ethics and Compliance Policy Committee</td>
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SCOPED: 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
- Corporate Regulatory Compliance Support
- Ethics and Compliance Officer
- Facility/Health Information Management Service (HSC)
- Parallon Business Performance Group HIM
- Case Management/Quality Resource Management
- Physician Advisors
- Administration
- Nursing
- Health Information Management
- Approved CDI Vendors

PURPOSE: To ensure that all personnel involved in the performance of the CDI function are aware of CDI query guidelines, policies, procedures and applicable coding guidelines which may impact the CDI process.

POLICY:
1. Each person involved in the performance of CDI must complete a minimum set of required training hours per calendar year as defined further in this policy. Any associated cost will be the responsibility of the facility.
2. Newly hired personnel involved in the performance of CDI must complete all items within REGS.DOC.003 under the “Procedure” section.
3. The work of newly hired personnel (within the first 90 calendar days of employment) must be carefully monitored by their direct supervisor until the training requirements have been met.

CLINICAL DOCUMENTATION IMPROVEMENT CE REQUIREMENTS:
1. All individuals responsible for CDI must meet the minimum continuing education requirement of 20 CE hours every 2 calendar years.
2. The continuing education could include, but is not limited to: attendance at workshops provided by Regulatory Compliance Support (Regs) or external organization, webcasts, seminars, attendance at exit conferences after a clinical documentation improvement review, annual review of company clinical documentation improvement policies and procedures, and clinical documentation improvement information to include articles, practice briefs, etc.
3. All mandatory education requirements that must be met are determined throughout the year by Regs. The consolidated listing is in the current year’s document, Regs Education Listing found on Atlas. This document must be referenced often to ensure compliance with meeting all mandatory education requirements as Regs will add to this list throughout the year.

PROCEDURE:
1. The facility ECO or designee must designate an appropriate person (e.g., Institution Administrator, Department Director) to track the required education hours for each person involved in CDI programs.

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2. The CDI Specialist’s education file must be retrievable and able to be accessed, if requested. It is the responsibility of the direct supervisor to ensure that each CDI Specialist receives the required education per calendar year.
   a. The education file must be monitored semi-annually by the direct supervisor to evaluate individual CDI Specialist educational needs.
   b. The education file should include, at a minimum, the following:
      i) Access to the credential certification (where applicable),
      ii) Access to CE forms from educational workshops,
      iii) Access to attendance forms from exit conferences, and
      iv) Acknowledgment of annual review of all Company CDI policies and procedures by either reviewing the hardcopy or taking the online courses for query policies and query forms.
   c. A sample of CDI continuing education tracking forms can be found on the Regs Atlas site.
   d. The CDI Specialist’s direct supervisor will be responsible for providing specific information related to CDI continuing education compliance to the facility ECO or designee, whichever is applicable.

3. The completion of CDI education hours, as defined in this policy, should be tracked using the Company’s HealthStream Learning Center (HLC).

4. 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.

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

6. 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 Association of Clinical Documentation Improvement Specialists (ACDIS) Certified Clinical Documentation Specialist (CCDS) Continuing Education requirement of 20 hours per two calendar year cycle
2. Clinical Documentation Improvement (CDI) - Implementation Policy, REGS.DOC.001
3. Query Documentation for Clinical Documentation Improvement (CDI) & Coding - Compliance Requirements Policy, REGS.DOC.002
4. CDI Orientation and Training Policy, REGS.DOC.003
5. Regs Education Listing on Atlas

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