







Trust Board Report

Meeting Date:	28 September 2015
Title:	Independent Report into Clinical Coding at RWT
Executive Summary:	This report is submitted to give assurance on the robust quality of work which is undertaken by the clinical coding Department at this Trust.
Action Requested:	To note and receive assurance.
Report of:	Acting Head of Clinical Coding & Data Quality
Author: Contact Details:	Joanne Cotterell Tel 01902 695543 Email joanne.cotterell@nhs.net
Links to Trust Strategic Objectives	To improve the culture of compassion, safety and quality in every department and service we offer To maintain the financial health of the organisation To attract, retain and develop all employees and improve employee engagement year on year
Resource Implications:	Revenue: None Capital: None Workforce: None Funding Source: N/A
Risks: BAF/ TRR (describe risk and current risk score)	None identified
Public or Private: (with reasons if private)	Public
References: (eg from/to other committees)	Report to Audit Committee on 3 September 2015 Report to MORAG August 2015
Appendices/ References/ Background Reading	None
NHS Constitution: (How it impacts on any decision-making)	In determining this matter, the Board should have regard to the Core principles contained in the Constitution of: <ul style="list-style-type: none">  Equality of treatment and access to services  High standards of excellence and professionalism  Service user preferences  Cross community working  Best Value  Accountability through local influence and scrutiny

Background Details

1 The Royal Wolverhampton NHS Trust on behalf of the Mortality Review Assurance Group (MORAG) commissioned CHKS (Capita) to provide an independent external view on the progress and achievement's made against a planned programme of change instigated within the Trusts Clinical Coding Team during the last three years. This was to provide assurance to the Trust and MORAG following negative published allegations of malpractices in our Clinical Coding Department (which is part of the Finance Directorate).

CHKS has been providing independent, external data assurance audits for the Audit Commission as part of the Payment and Tariff Assurance Framework (previously the PbR data assurance framework) for the last eight years. In 2014/15, CHKS are overseeing the management and delivery of the entire framework on behalf of Monitor. The staff responsible for developing the methodologies used by the assurance framework led the work at The Royal Wolverhampton NHS Trust.

The review consisted of, but was not limited to:-

- The improvement processes that have been implemented during 2012-13 to 2014-15 (last 3 financial years)
- A review of audit reports/results undertaken over a three year period and their recommendations
- Assessing action plans following audit recommendations
 - *A review of the clinical coding team – an assessment of sufficient staffing levels, qualified clinical coders and support arrangements for high performance;*
 - *A review of the clinical coding outputs – the accuracy of coding carried out by the coders over the past three years;*
 - *A review of the documentation review – what information is recorded, how it is recorded and the process for presenting information to the clinical coding team;*
 - *A review of the data quality – how the Trust ensures high levels of data quality and identifies errors in its coded data and a review of IG audit reports over the last three years;*
 - *The level of clinician engagement - through individual interviews, a look at the relationship and participation of clinicians and service managers within the coding process, to collaboratively improve coding outputs; and*
 - *The level of reporting – the feedback processes to clinicians and management about coded data and how the feedback is used.*

The report identified that the trust has made improvements in all areas over the last three years, based on the documentary evidence supplied and interviews with Trust staff. Positive improvements included:

- An increase in the size of the clinical coding team
- The development of an internal coaching programme
- The introduction of a formal audit programme
- A move from ward based to office based coding improving efficiency
- An increase in the number of ACC qualified coders from 2 to 11, through the Trust's training and recruitment programme
- A significant reduction in the sickness levels in the Department.

The Trust improved its Information Governance compliance with respect to its coding from level 2 in March 2013 to level 3 in February 2015 (meaning coding accuracy was more than 95% correct).

There were a small number of recommendations made:-

- Detailed documentary evidence of system mapping, data quality checks, interaction with the coding team and actions from governance meetings requires some improvement
- Although regular clinical engagement for mortality checks and coder queries was good, a more formal plan for clinical engagement needs to be embedded across all specialties
- Some action plan versions would benefit from details of start date and completion date for individual actions to improve records.

An action plan has been drawn up and the Department is committed to dealing with the matters in it, with a target for completion of outstanding actions by December 2015.

The report was discussed by the Audit Committee on 3 September 2015.

The Chief Executive of the Trust has commended the Department for the improvements already made.