



**NEWTON-WELLESLEY HOSPITAL
DEPARTMENT OF PATHOLOGY AND LABORATORY SERVICES**

ANNUAL NOTICE OF LABORATORY COMPLIANCE

As an integral part of Newton-Wellesley Hospital's (NWH) Laboratory Compliance Program, we are providing you with our annual notice of clinical compliance guidelines. Our goal is to process the right test, for the right reason and for the right patient based on valid lab orders submitted by the authorized provider. The contents of this notice are based on recommendations from the Office of the Inspector General (OIG) that explain ordering providers' obligations under federally funded programs.

For each test requested from NWH Laboratory (using a paper requisition or electronic order entry system), we require the ordering clinician to adhere to the following key elements of compliance:

1. The medical necessity for each individual test ordered has been accurately documented in the patient's medical record.
2. The laboratory requisition/order is always submitted with accurate diagnosis for each test (as documented within the patient's medical record).
3. The documentation within patient's medical record which may be part of an internal and/or external audit will be verified and submitted to the laboratory upon request (preferably within 2 business days).

I. Laboratory Requisition/Electronic Order:

The following information must be provided with each order submitted to the NWH Laboratory:

1. Patient's Full (legal) Name
2. Patient's Date of Birth
3. Patient's Gender
4. Order Date
5. Diagnosis
6. Ordering Provider's Signature*

*** Signature Stamps on paper requisitions:**

For paper requisitions, please be aware that **NWH Laboratory will not accept signature stamps** as sufficient documentation to support a claim for payment. If the submitted requisition contains a signature stamp, it will be considered an incomplete physician's order. Therefore, ***please cease the use of signature stamps on all NWH Laboratory Requisitions.***

In addition, the following information is also required with each order submitted to NWH Laboratory:

1. Collection Date and Collection Time
2. Insurance information (may attach a copy of insurance card, face sheet or demographic sheet)
3. Tests requested
4. For Microbiology specimens a source is also required.
5. For GYN cytology (Pap Tests):
 - a. A source (cervical or vaginal) is required.
 - b. Date of the patient's Last Menstrual Period (LMP) is required by the College of American Pathologists. Narrative information is valid (i.e. pregnant, postmenopausal etc)

II. Medical Necessity Coverage of Lab Tests:

Some lab tests will only be covered by Medicare if the test is ordered with a covered diagnosis as defined by the Medicare program ("Medical Necessity Review Tests"). Tests that are eligible for Medical Necessity Review are printed in red on the NWH Laboratory Requisition.

To review the complete listing of tests that Medicare has designated for Medical Necessity Review, access the following link:

<https://www.cms.gov/Medicare/Coverage/CoverageGenInfo/>

In addition to the list of tests in the link above, there are local policies that require medical necessity for the following tests:

1. Vitamin D
2. 1,25 dihydroxy Vitamin D
3. RAST (all allergy testing)
4. Pap smears
5. HPV testing on patients younger than 30 years of age
6. Flow Cytometry
7. Tox Screens (Qualitative Urine)

III. Testing Panels:

- The NWH Laboratory does not accept any custom testing panels.
- Only Centers for Medicare/Medicaid Services (CMS) approved organ and disease oriented panels will be accepted and performed at NWH Laboratory.
- Organ and disease oriented panels may only be paid when all the component tests of the panel are medically necessary.
- *Please note that custom panel orders often produce greater charges to insurers/patients and result in the ordering of testing which is not medically necessary. Any individual that knowingly causes medically unnecessary testing to be performed and billed to federally funded health care programs may be subject to sanctions and remedies available under civil, criminal and administrative law*

IV. Verbal Orders and Add-on requests:

- Verbal Orders are ONLY acceptable in urgent, off-hour circumstances.
- Verbal Orders must be followed up by a faxed order of completed NWH Laboratory Requisition within 24 hours or the next business day.
- Add on requests from Providers using EPIC CLINICALS should be submitted using the “electronic lab Addon order” within Epic Clinicals.
- Add on requests from Providers not using EPIC CLINICALS should be placed using the NWH Laboratory Requisition with any additional supporting diagnostic data and faxed to Lab Customer Service at (617) – 243 - 6767

V. Standing Orders:

- NWH Laboratory accepts Standing Orders for patients who have been determined to require an extended course of treatment which necessitates ongoing laboratory monitoring.
- Standing Order requests from Providers using EPIC CLINICALS should be submitted using Epic Clinicals.
- Standing Order requests from Providers not using EPIC CLINICALS should be placed using the NWH Laboratory Standing Order Form with any additional supporting diagnostic data and faxed to Lab Customer Service at (617) – 243 - 6767
- All ordering providers with existing standing orders are notified by Laboratory Customer Service Representatives before the yearly expiration date to review, and renew or cancel the standing orders on their patients. It is the provider’s responsibility to carefully review and verify the elements on the standing order.
- The frequency of Standing Orders must be specified for each Laboratory Standing Order. “As needed” or “PRN” will not be accepted for frequency.

Anthony J. Guidi, M.D., Chair of Pathology, at Newton-Wellesley Hospital, is the CLIA Laboratory Clinical Consultant and can be reached at 617-243-6234 for any further questions.

If you have any questions or concerns please do not hesitate to contact:

- Margaret Fisher, NWH Senior Compliance Manager, at mmfisher@partners.org, or at 617-243-5248
- Robert Page, Lab Administrative Director, at rpage@partners.org, or at 617-243-6772
- Hemali S. Patel, Lab Compliance Manager, at hpatel@partners.org or at 617-243-6285

Thank you for your continued support of the Laboratory Compliance program.