

Status **Active** PolicyStat ID 11773869



Origination	1/24/2014	Owner	Stacy-Eleanor Ralston
Final	8/30/2022		
Approved		Policy Area	Laboratory
Effective	8/30/2022	Applicability	Sutter Health System
Last Revised	8/30/2022	References	Annual Review, Billing & Coding
Next Review	8/30/2023		

Laboratory Services Test Orders and Requisitions Policy

PURPOSE

The purpose of this policy is to establish minimum required elements for outpatient laboratory test Orders and Requisitions.

POLICY

It is policy that diagnostic laboratory tests shall be ordered by a Physician/Advanced Practice Clinician (APC) who is treating the patient, that laboratory test Orders and information supporting medical necessity are documented in the patient's medical record, and that Orders and Requisitions include the data elements defined in the procedure section of this policy.

SCOPE

This policy applies to Sutter Health and any legal entity for which Sutter Health, or its affiliate is the sole member or directly or indirectly controls greater than 50% of the voting power or equity interest and does not have a third-party manager (herein referred to as Sutter).

DEFINITIONS

Advanced Practice Clinician (APC) means a physician assistant (PA), a nurse practitioner (NP), a clinical nurse specialist (CNS), certified nurse anesthetist (CRNA) or a certified nurse midwife (CNM) who furnishes a consultation, diagnoses, or treats a patient for a specific medical problem.

Electronic Health Record (EHR) is an electronic version of a patient's medical history that is maintained by the Physician/APC over time and may include all key administrative clinical data relevant to that

person's care under a particular Physician/APC, including demographics, examination findings, immunizations, laboratory data, medications, Orders, past medical history, problems, procedures performed as documented, progress notes, radiology reports, and vital signs.

Non-Credentialed Physicians means community or out-of-state Physicians who are not credentialed or privileged to admit to a Sutter facility.

Order is a communication from a Physician/APC requesting that a diagnostic test be performed.

Order Sets (acute care-inpatient/outpatient only) are defined groups of tests or other services that are commonly ordered together for convenience.

Physician means a doctor of medicine or osteopathy, a doctor of dental surgery or dental medicine, a doctor of podiatric medicine, or a doctor of optometry.

Requisition is a paper form used to place Order(s) for clinical laboratory testing.

Smart Sets (ambulatory setting only) are documentation templates in the EHR that include a group of Orders and other elements, such as notes, chief complaints, smart groups, and levels of service, that are commonly used together to document a specific type of visit.

Standing Order is an Order specific to an individual patient for recurring laboratory tests, including a specific frequency and duration.

PROCEDURE

A. Laboratory Order(s) may be submitted in any of the following formats:

1. Electronic Orders, within the EHR,
2. Paper Orders (e.g., paper Order(s) submitted by community Physicians (non-Sutter Physicians) utilizing their own Requisitions),
3. Clinical laboratory Requisition forms,
4. Verbal or telephone Order(s) and
5. Standing Orders.
Laboratory Orders are acceptable if submitted by a Physician/APC who is treating the patient.

B. Valid laboratory Orders shall contain the following essential information:

1. Physician/APC (e.g., name, licensure (e.g., John Smith, MD) and address),
2. Patient's full name or unique identifier,
3. Gender and date of birth or age of patient,
4. Test(s) to be performed,
5. Date of Order,
6. Diagnosis or indication (diagnosis narrative) for all tests,
7. Any other relevant information to verify accurate and timely testing and reporting such as specimen source, and

8. Orders for Pap smears must also include the patient's last menstrual period and history.

C. Signature Requirement

Physician/APCs are not required to sign paper laboratory Requisitions, although it is recommended. If the paper Requisition is not signed, a copy of the patient's medical record, authenticated by the Provider, may be used as documentation of the Order. The medical record supporting the Order must be available to the laboratory at the time of testing and available to the Centers for Medicare & Medicaid Services (CMS) or its agent on request.

D. Verbal Orders

The laboratory may accept verbal Orders from an authorized Physician/APC and when the Order meets the minimum requirements outlined as items one (1) through seven (7) in procedure section B above. Sutter laboratories shall solicit a written or electronic copy of the Order within thirty (30) days of the verbal Order and must maintain the Order or a record of its efforts to obtain the Order.

E. Standing Orders

The laboratory may accept Standing Orders from authorized Physician/APCs that meet minimum requirements outlined as items one (1) through seven (7) in procedure section B above. Standing Orders can be renewed with the submission of a new request from the Authorized Physician/APC containing the required elements.

Automatic, routine or generic Standing Orders for laboratory tests not specifically required for an individual patient's care are not allowed. For example, an Order that reads, "Test Mr. Patient's Hemoglobin A1C every three (3) months for twelve (12) months," is an acceptable Standing Order. On the other hand, an Order that states, "Perform an annual lipid panel on all patients over age fifty (50)," is not an appropriate Standing Order. Standing Orders for clinical laboratory tests may be appropriate when the following requirements are met:

1. Each ordered test must be appropriate and necessary for the individual patient's clinical circumstances, diagnosis, and/or patient management as determined by an authorized Physician/APC.
2. The frequency and types of tests must be medically necessary.
3. The diagnosis must be indicated for each Standing Order.
4. The duration of the Standing Order must be documented to include a beginning and an ending date and must be reviewed at least annually and renewed as appropriate for patient care (maximum duration is twelve (12) months).
5. The testing frequency of the Standing Order must be documented.

F. Paper Requisition Design

The Sutter laboratory Requisition is the preferred paper Order; however, the laboratory will accept other forms of paper orders if all essential information is provided as listed in procedure section B above.

Laboratory Requisition design should include prompts to provide the required essential elements for submission of an authorized laboratory Order as described above including, but not limited to, the following:

1. Space for patient demographic information,
2. Space for Physician/APC signature,

3. Space for test specific detail, such as patient preparation instruction and specimen source information,
4. Space for test priority and specific reporting instructions/copies to,
5. Space for writing in tests that are not pre-printed,
6. Organ/Disease specific panel listing from the AMA Current Procedural Terminology,
 - a. Individual tests must also be listed
7. If reflex test Orders are included, the Requisition must also contain options to Order individual assays in addition to the reflex tests for those considered to be optional reflex offerings,
 - a. Individual tests must also be listed, and
 - b. Reflex criteria must be listed.
8. Medical Necessity language: *"When Ordered tests for which Medicare reimbursement will be sought, the Ordering Physician should Order ONLY tests that are medically necessary for diagnosis or treatment of the patient" and "Medicare does not generally reimburse for screening tests."*
9. Space on the back of the Requisition to provide additional information such as Advance Beneficiary Notice (ABN) guidance, current procedural terminology (CPT) codes, most common International Classification of Diseases (ICD-10-CM) codes, patient specimen collection locations and website name as needed.

G. Requisition Design Options:

1. Provide a space for the Physician/APC to write in tests and test codes – interpretation of hand-written tests.
2. The back of a Requisition includes general ICD-10-CM codes or ABN guidance or general billing information (CPT).
3. Provide patient service center locations and website information.

H. Order Sets and Smart Sets:

1. Order Sets and Smart Sets may be used to Order the Medicare pre-approved panels that are represented on the Requisition.

I. Out of State or Non-Credentialed Physician Orders:

1. A California laboratory may accept out-of-state or Non-Credentialed Physician Orders for laboratory tests so long as the authorized Physician/APC is licensed in the state in which they practice and is in good standing with Medicare.

REFERENCES

[California Business and Professions Code \(BPC\) Division 2. Healing Arts, §1288; §1220 \(d\) \(2\) \(A\); § 2052\(a\) \(b\); § 2060; § 2725\(c\) \(2\)](#)

[CMS, Clinical Laboratory Improvement Amendments \(CLIA\)](#)

[CMS, Complying with Documentation Requirements for Laboratory Services MLN ICN 909221](#)

[CMS, Complying with Medicare Signature Requirements](#)

[CMS, Internet Only Manual \(IOM\), Medicare Benefit Policy Manual, Publication 100-02, Chapter 15, Section 80.6](#)

[CMS, Provider Compliance Tips for Laboratory Tests, MLN ICN 909407](#)

[Department of Health and Human Services, Publication of OIG Compliance Program Guidance for Clinical Laboratories; Federal Register; Vol. 63 No. 163, page 45076](#)

[Federal Register, 42 CFR Chapter IV, 410.32 Diagnostic x-ray tests, diagnostic laboratory tests, and other diagnostic tests: Conditions](#)

[Federal Register, 43 CFR Chapter IV, Part 493 Laboratory Requirements, §493.1105\(b\); §493.1453; §493.1241](#)

[Noridian, Physician's Orders for Diagnostic Laboratory Tests Article](#)

[Reflex Laboratory Services](#)

ATTACHMENT

None

All Revision Dates

8/30/2022, 2/1/2021, 12/14/2017, 10/9/2017, 6/14/2017, 1/24/2014

Approval Signatures

Step Description	Approver	Date
Policy Owner Verify Policy Communicated	Stacy-Eleanor Ralston: Director, Laboratory Quality & Compliance	8/30/2022
System Policy & Procedure Committee	Joyce Sklark: Officer, Ethics & Compliance	8/28/2022
SPPC Pre-review	Joyce Sklark: Officer, Ethics & Compliance	8/18/2022
Revenue Integrity Organization (RIO) Committee	Jeffrey Wills: Manager, Charge Edit & Audit	7/14/2022
Reimbursement Counsel	Hilary Isacson: Assistant General Counsel	7/1/2022

Director Coding Compliance

Lisa Knowles: Contractor
Director Doc & Data Quality

6/28/2022

Policy Owner

Stacy-Eleanor Ralston: Director,
Laboratory Quality &
Compliance

6/28/2022

COPY