



IMPORTANT ALERT REGARDING DOCUMENTATION TO SUPPORT LAB ORDERS

April 2, 2024

Recent audit results of Skilled Nursing Facilities and Laboratories show greater attention is required to ensuring accurate, complete and timely documentation in each patient's medical record. The OIG, CMS, Medicare Administrative Contractors (MACs) and Uniform Program Integrity Contractors (UPICs) have identified SNFs, NFs, and Clinical Laboratories at higher risk of noncompliance and audit review.

The auditors are specifically focusing on the following regarding orders for clinical laboratory services:

- 1. The order (written or verbal) must be documented in the patient's medical record and dated.**
- 2. The physician or other qualified practitioner permitted by state law to order lab tests (such as, P.A., A.P.R.N.) must have ordered each test.**
- 3. The documentation in the patient's medical record at the time of the order must support the basis and medical necessity for ordering the test.**
- 4. The test results must be included in the medical record and must be incorporated in the progress notes to address the diagnosis and treatment of the patient's medical condition.**

Licensure agencies, accreditation organizations, Medicare, Medicaid, and commercial insurers require facilities to maintain legible, complete, and dated evidence in the medical record of the medical necessity to support the order for all lab tests in each patient's medical record. Progress notes should carefully document the signs and symptoms evidencing the need to order the test, as well as how the results of the tests are incorporated into the patient's diagnosis and treatment. Auditors and Surveyors will look to see whether these requirements are evident in the medical records they review.

Thank you for your continued cooperation and understanding. We value our relationship and strive to provide the best possible service to our clients and patients. Should you have any questions or concerns, please reach out to me at your convenience.

Sincerely,

Corey Gillen

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cc: Medical Director
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