Tenet Health	Regulatory Compliance Policy	No.	COMP-RCC 5.03
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		Effective Date:	06-18-15
	LABORATORY PANELS	Previous Versions Dated:	06-01-11
		Corporate Review Dated:	07-18-19

I. SCOPE:

This policy applies to (1) Tenet Healthcare Corporation and its wholly-owned subsidiaries and affiliates (each, an "Affiliate"); (2) any other entity or organization in which Tenet Healthcare Corporation or an Affiliate owns a direct or indirect equity interest greater than 50%, and (3) any hospital or healthcare facility in which an Affiliate either manages or controls the day-to-day operations of the entity (each a "Tenet Entity") (collectively, "Tenet").

II. PURPOSE:

The purpose of this policy is to establish the protocols for accepting orders for laboratory panels in Tenet Entities providing separately billable clinical laboratory services.

III. DEFINITIONS:

A. "**Panel**" means a group of laboratory tests represented by a single order. A panel contains tests that are separately identifiable by individual CPT codes.

B. "**Standard panels**" mean panels defined by the American Medical Association (AMA) containing multiple tests represented by a single CPT code. Examples of standard panels include Hepatic Function Panels and Lipid Panels.

C. "**Non-Standard panels**" mean panels represented by a single order containing multiple tests that have not been approved by the AMA to be reported using one CPT code. Each test must be reported using its unique CPT code.

1. "**Disease panels**" are non-standard panels that are ordered at the panel level but are reported using individual CPT codes representing the services or methodologies provided in order to facilitate interpretation of the test. The results of each item in the panel are interrelated and should not be considered separately for diagnostic purposes. Examples of such panels include Factor 5 Leidin or Lupus-Type Anticoagulant.

2. "**Convenience (custom) panels**" are a group of tests that are bundled together for the ease of ordering. Each component of a Convenience (custom) panel has results that are independently diagnostic. Convenience (custom) panels contain individual tests that must be ordered, reported and billed using individual CPT codes. Examples of convenience (custom) panels include Cardiac Profile and a Pedi 12.

D. "**Physician**" means, in the context of this policy, a medical doctor or any licensed independent practitioner who is authorized by state law to order tests or services and/or is legally accountable for establishing the patient's diagnosis.

IV. POLICY:

Tenet Entities must not accept orders for Convenience (custom) panels. Each Tenet Entity must only accept Standard panels and those Disease panels that have been approved by its Medical Staff. Each Tenet Entity's Medical Staff must review and approve its Disease panels at least annually.

V. PROCEDURE:

A. Tenet Entity's Implementation

1. Each Tenet Entity must ensure that it's clinical and/or order entry systems do not contain Disease panels unless those panels have been approved by the Tenet Entity's Medical Staff. The Medical Staff must review and approve all Disease panels at least annually. All Medical Staff approvals must be based on clinical indications and not on convenience.

    a. Examples of Appropriate Clinical Indications:

        (1) single diagnostic panel containing multiple tests

        (2) diagnostic information is only obtained when tests are grouped together

        (3) individual tests not normally ordered separately for the expected condition or diagnosis

        (4) evidence-based criteria, as documented in peer-reviewed journals or professional medical society materials

    b. Examples of Convenience Indications:

        (1) single panel order containing multiple tests

        (2) tests are unrelated to a single diagnosis

        (3) tests normally are ordered separately and can be separately diagnostic

2. Each Tenet Entity must ensure that it's clinical and/or order entry systems do not contain Convenience (custom) panels.

3. Each Tenet Entity must have a process in place to ensure Physicians are

notified of the requirements of this policy, and all approved Disease panels, at the time of initial application to the Medical Staff and on an annual basis thereafter. (See Regulatory Compliance policy COMP-RCC 5.09 Laboratory Annual Notice.)

B. Auditing and Monitoring

Audit Services will audit adherence to this policy.

C. Responsible Person

The Laboratory Director is responsible for ensuring that all individuals adhere to the requirements of this policy that these procedures are implemented and followed at the Tenet Entity, and that instances of noncompliance are reported to the Compliance Officer.

D. Enforcement

All employees whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate performance management pursuant to all applicable policies and procedures, up to and including termination. Such performance management may also include modification of compensation, including any merit or discretionary compensation awards, as allowed by applicable law.

VI. REFERENCES:

- Regulatory Compliance policy COMP-RCC 5.01 Orders for Outpatient Tests and Services

- Regulatory Compliance policy COMP-RCC 5.09 Laboratory Annual Notice