

IDENT	LABCOMPL100.004
Type of Document	Policy
Applicability Type	Department-Level
Title of Owner	Network Dir Ops Lab&Path Svcs
Title of Approving Official	Medical Director of Clinical Laboratories
Date Effective	9/3/2002
Date of Next Review	5/14/2017



TITLE: Custom Profiles

PURPOSE: The purpose of this policy is to provide guidance to all University of Vermont Medical Center (UVMMC) and billing personnel as to how Custom Profiles are created, maintained and discontinued.

POLICY STATEMENT:

Custom profiles permit physicians to establish their own test profile, consisting of a particular group of tests, that they order frequently for their own patients. Physicians in certain specialties often have such groupings for particular clinical situations.

The government recognizes the need for custom profiles that reflect a physician's test packaging needs. However, the government expects the laboratory that constructs the custom profile to provide a disclosure notice to the physician who uses a custom profile. This disclosure is called a Physician Acknowledgement of Customized Profile.

By way of acknowledgement, the physician affirms the understanding that:

1. The tests ordered are medically necessary and will provide the correct ICD-9 code for documentation.
2. Individual tests or a less inclusive profile should be ordered when not all of the tests in the custom profile are medically necessary.
3. The Office of Inspector General (OIG) of the Department of Health and Human Services takes the position that an individual who knowingly causes a false claim to be submitted, may be subject to sanctions and other remedies under civil, criminal or administrative law.

The Physician Acknowledgement of Customized Profile form includes the profile name, the test components, the CPT codes billed, the patient price and the Medicare reimbursement amount. This information ensures that the physician has adequate information to make a fully informed test ordering decision and understands the implications of ordering a custom profile.

The Laboratory requests that the physician sign a Physician Acknowledgement of Customized Profile when a custom profile is created per physician request and on an annual basis for as long as the physician wishes to order the custom profile.

PROCEDURE:

1. All Physicians are requested to sign a Physician Acknowledgement of Customized Profile form if they request the laboratory to create a profile.
2. On an annual basis, the Laboratory Marketing Specialist requests a printout from LIS listing all physicians who use custom profiles.
3. A Physician Acknowledgement of Customized Profile form is sent to each physician on the list who has ordered the same profile at least three times in the past year. The form describes the

particular custom profile the physician has ordered the previous year and requests that the physician signs the form and returns it to the laboratory.

4. If a physician does not return the first form, then a second form is sent with a letter from the Laboratory Compliance Specialist. The letter explains the importance of the Physician Acknowledgement of Customized Profile form and again requests that the physician sign and return the form.

6. The Laboratory makes 2 attempts to obtain a Physician Acknowledgement of Customized Profile. The laboratory's efforts to obtain the Physician Acknowledgement of Customized Profile is documented by the Laboratory Marketing Specialist and reported to the Laboratory Compliance Specialist. The original paper version of the signed form will be kept for 1 year. Documentation of the lab efforts and physician compliance will also be stored electronically indefinitely.

MONITORING PLAN: N/A

REFERENCES: OIG Compliance Program Guidance for Clinical Laboratories, August 1998.

APPENDICIES:

1. *Physician Acknowledgement of Custom Profiles*
2. Follow-up letter to physicians regarding Custom Profiles

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