MEMORANDUM

QTC

To:        All QTC/Strategic Services Personnel with Access to Medical Reports

From:      Medical Director

Subject:   Quality Assurance of Medical Reports

I acknowledge that I have received a copy of and fully understand the contents of the Medical Report Quality Assurance Policy & Procedure VER (05/08). I further understand that this policy is available for review at anytime on the QTC Intranet site.

I agree to comply with this policy for the handling of medical reports. I understand that violations of this policy and procedure will result in disciplinary action up to and including termination of employment or temporary assignment with QTC.

______________________________
Printed Name

______________________________
Signature

______________________________
Date

This policy supersedes and nullifies all previous policy and procedure documents on this item
Medical Report Quality Assurance

Objective:
To provide a guideline for the acceptable handling of medical reports.

Scope:
This policy applies to all employees, contractors, temporaries, and all others who have access to medical reports ("Personnel") of QTC Management, Inc. and its affiliates (hereafter referred to as “QTC/Strategic Services”).

Definitions:
“Provider” A duly licensed or certified health care professional performing within the scope of the appropriate licensure or certification.

“Provider-Author” A duly licensed or certified health care professional, who authors the respective medical report and assumes the ultimate responsibility for its content and composition.

Administrative Statement:
Under the supervision of the Medical Director, QTC/Strategic Services provides orientation and ongoing quality feedback to its contracting Providers to assist them in their preparation of unbiased, quality medical reports that are: 1) Clear; 2) Consistent; and 3) Complete.

I. Policy:

1. The examining Provider, being a licensed professional and the author of the medical report, exercises the final authority and assumes the ultimate responsibility for the content and composition of the medical report that bears his/her signature.

2. The quality feedback process is a service which is administrative in nature and acceptance or rejection of any feedback is at the sole discretion of the Provider. The quality feedback process strictly prohibits any QTC/Strategic Services Personnel from questioning the examining provider’s medical decision or opinion.

3. The diagnoses, opinions, conclusions or medical analysis expressed in the report may only be modified and/or changed by the Provider-Author and in the sole discretion of the Provider-Author. Under no circumstances should any QTC/Strategic Services Personnel

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request that a Provider reconsider and/or make a material change to his/her medical opinions, conclusions, diagnoses or analysis.

4. Once signed by the Provider-Author, the medical report may not be modified or changed in any way. If a client requests clarification of a Provider’s opinions, conclusions, diagnoses or analysis expressed in the report, the Provider may prepare a written response or addendum, separate from the Provider’s report.

5. A Provider places his/her original signature on a medical report as his/her acknowledgment and declaration that the opinions and conclusions expressed in the report are those of the Provider-Author and of his/her approval of and responsibility for the content of the medical report. Under no circumstances may any QTC/Strategic Services Personnel other than the evaluating Provider sign a medical report.

6. Any QTC/Strategic Services Personnel found to be in violation of this policy will be subject to disciplinary action up to and including termination of employment.

II. Procedure:

1. QUALITY ASSURANCE REVIEW: The Provider’s narrative report is tracked and given to the Quality Assurance (“QA”) Specialist.

   1.1 The QA Specialist inspects and assesses the narrative report to confirm that:

      • The report is clearly written and easy to understand.

      • The report is internally consistent. For instance, there are no transpositions of “right” and “left” or of the gender of the claimant throughout the report.

      • The report is complete: all matters of issue are addressed, the Provider has answered all questions, all necessary forms have been completed by the Provider and the Provider has included a medical rationale and/or medical evidence in order to substantiate his/her answers and opinions.

   1.2 The QA Specialist may consult with the Medical Director for technical questions or advice at any time.

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1.3 If, after considering all quality assurance criteria, the QA Specialist believes that completion or clarification of any part of the report may be appropriate, the QA Specialist may opt for one (or more) of the following:

1.3.1 The narrative report and a note identifying areas where completion or clarification may be appropriate are forwarded to the examining Provider for his/her consideration.

1.3.2 The QA Specialist may contact the examining Provider to discuss where completion or clarification may be appropriate.

1.4 The examining Provider may choose to respond in any of the following manners:

1.4.1 The Provider may communicate his/her responses by dictating an addendum or electronically sending his or her response back to QTC/Strategic Services.

1.4.2 The Provider may contact the QA Specialist to discuss the case.

1.4.3 The Provider may decline to add to or clarify his/her report. In this instance, the report is considered final.

1.5 Any of the above steps may be repeated at the discretion of the Provider until he/she is satisfied with his/her report.

1.6 Copies of any written communications to and/or from the Provider regarding completion or clarification of the report (or any notes of discussions with the Provider on that subject) are put with the copy of the Provider’s signed medical report maintained by QTC/Strategic Services.

2. PROVIDER SIGNATURES: To meet our clients’ strict report turnaround requirements, the following signature policy and procedures are followed:

2.1 For Providers who transcribe their own reports, a signed report is sent to QTC/Strategic Services.

2.2 Delivery of reports: The following are the appropriate methods of delivering a report to the examining Provider for review and signature:

2.2.1 Reports may be given to Providers to sign in person.

2.2.2 Reports may be sent to Providers either via courier or overnight mail for signature.

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2.2.3 Reports may be sent electronically to the Provider for review and signature. If sent electronically, the report transfer must be in compliance with all federal and state laws or regulations regarding electronic transfer of medical reports.

2.3 Report signatures: The examining Provider signs his/her medical report by making an original signature on the medical report or, when legally permissible, by appropriately affixing an electronic signature onto the report.

2.4 When QTC/Strategic Services Personnel receive an appropriately signed report, it is sent to billing and then it is delivered to the client.

3. HANDLING CLIENT REQUESTS FOR REPORT CLARIFICATION

3.1 If a client has a question regarding a Provider’s medical report, QTC/Strategic Services Personnel should ask the client to submit a request in writing. A copy of the written request for clarification from the client and a copy of the Provider’s report in question are sent to the Provider for a reply.

3.2 The Provider’s reply is sent to the QA Specialist to ensure the Provider’s response addresses all the issues raised by the client.

3.3 The Provider’s reply is sent to the client. A copy of the Provider’s reply and of the request for clarification are put with the copy of the Provider’s medical report maintained by QTC/Strategic Services.

3.4 Under no circumstances should any QTC/Strategic Services Personnel make a request that asks the Provider to reconsider and/or make a substantive change to his/her medical opinions.

4. REPORTING FALSIFICATION/UNACCEPTABLE HANDLING OF MEDICAL REPORTS

4.1 If you witness falsification/unacceptable handling of medical reports or if you have reason to believe it may be occurring, you must notify your supervisor or another member of management immediately.

4.2 Do not assume the company is aware of this situation. It is your responsibility to bring your concerns to the attention of management so that they can address and resolve the situation. Failure to report unacceptable handling of medical reports will result in appropriate disciplinary action up to and including termination of the employment relationship.

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4.3 There will be no retribution taken against any QTC/Strategic Services personnel who report a violation or suspected violation in good faith. A supervisor or other employee shall be subject to disciplinary measures for intimidating or imposing sanctions on QTC/Strategic Services Personnel who report a suspected violation in good faith.

4.4 Any allegations of unacceptable handling of medical reports shall be fully and completely investigated by QTC/Strategic Services. If after thorough review of the information gathered during an investigation it is determined that a member of QTC/Strategic Services Personnel has engaged in prohibited or unlawful handling of medical reports, appropriate disciplinary action up to and including termination of employment will be taken against the offending person.

Approval ______Signature on File with Date_______  Date: _____________________
Jamshid Tamiry, M.D.
Medical Director