

# CORPORATE POLICY

<b>Manual/Library Name:</b> Ethics and Compliance	<b>No:</b> EAC.06.01
	<b>Page:</b> 1 of 2
<b>Title:</b> Reflex Testing (COMP-RCC 5.06)	<b>Effective Date:</b> 01/31/24
	<b>Previous Versions:</b> 06/18/15; 06/01/11
	<b>Approved By:</b> Executive Leadership Team
	<b>Approval Date:</b> 01/16/24

## I. Scope:

This policy applies to Tenet Healthcare Corporation, its subsidiaries and affiliates (each, an “Affiliate”), any other entity or organization in which Tenet or an Affiliate owns a direct or indirect equity interest of greater than 50%, and any entity in which an Affiliate either manages or controls the day-to-day operations of the entity (each, a “Tenet Entity”) (collectively, “Tenet”).

## II. Purpose:

To standardize Reflex testing policies in all Tenet Entities providing separately billable clinical testing.

## III. Definitions:

**Reflex tests:** Are tests that are automatically performed subsequent to an initial test when certain clinical indications are observed in the test results. Reflex tests are used to clarify or elaborate on primary test results. Reflex tests are based on clinical documentation and designed to improve patient outcomes. Examples of Reflex tests include qualitative HCV reflexed to a quantitative HCV and automated differential reflexed to a manual differential.

**Physician:** 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 legally accountable for establishing the patient’s diagnosis.

## IV. Policy:

Reflex tests must be based on medical necessity considerations with respect to the specific diagnostic tests and must be documented in a written policy. Reflex tests must include specifically stated criteria and rationale.

## V. Procedure:

- A. Each Tenet Entity’s Medical Staff must review and approve the Tenet Entity’s Reflex test policies on an annual basis.
- B. Reflex testing that have not been approved by the Medical Staff will not be performed. Separate orders for follow-up tests issued following the completion of the tests initially ordered are required in such situations.

## CORPORATE POLICY

<b>Manual/Library Name:</b> Ethics and Compliance	<b>No:</b> EAC.06.01
	<b>Page:</b> 2 of 2
<b>Title:</b> Reflex Testing (COMP-RCC 5.06)	<b>Effective Date:</b> 01/31/24
	<b>Previous Versions:</b> 06/18/15; 06/01/11
	<b>Approved By:</b> Executive Leadership Team
	<b>Approval Date:</b> 01/16/24

C. On an individual patient-by-patient basis, the Physician must be able to opt out of Reflex testing. In such cases, the order or requisition must clearly state that the Physician has requested that Reflex testing specific to the order not be performed.

D. Tenet Entity Implementation

1. Each Reflex test policy must include Reflex testing criteria and reference supporting medical documentation.
2. Each Tenet Entity must have a process for its Medical Staff to initially review and approve all Reflex tests and then review and approve all Reflex tests on an annual basis. The Medical Staff review must include the initial test, the criteria used, the subsequent test and related CPT codes.
3. The Clinical Department Director is responsible for maintaining documentation regarding each Reflex test policy as required by [Administrative policy AD 1.11 Records Management](#) and its [Record Retention Schedule](#).
4. Laboratory Reflex testing policies must be included in the Tenet Entity’s annual notice (see [Regulatory Compliance policy COMP-RCC 5.09 Laboratory Annual Notice](#)).

### VI. 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.

### VII. References:

[Administrative policy AD 1.11 Records Management](#) and its [Record Retention Schedule](#)  
[Regulatory Compliance policy COMP-RCC 5.09 Laboratory Annual Notice](#)