

INSTRUCTIONS FOR PREPARING A JOINT MEDICAL RECORDS EXHIBIT

A. DOCUMENTS TO BE INCLUDED IN THE JOINT MEDICAL RECORDS EXHIBIT

1. Is it a medical record?

Non medical records may come in at the hearing but cannot be pre-filed within the medical records exhibit.

2. Is it a “relevant” medical record?

Records that tend to either prove or disprove a fact at issue.

Hospital nurse’s notes *are not* relevant records.

Duplicate records *are not* relevant records.

B. WHO/WHAT IS A MEDICAL PROVIDER?

Medical records must be separated in the exhibit by medical provider.

A medical provider is a medical practitioner, and anyone the practitioner supervises, who provides medical treatment within that provider’s area of practice. It does not include copies of records from physicians treating the patient on referral from that provider, diagnostic testing results, or hospital surgical reports.

General practice treatment received from clinics not assigning a specific provider, such as IHC Instacare, are one provider. Or, even if physicians are assigned to patients, if other providers of the same specialty see other providers’ patients, they are one provider. However, referrals within a clinic from one practice specialty to another are separate providers. For example, Granger Medical Clinic may have a patient see different general practice providers. These treatment records are one provider. But, if the general practice provider refers the patient to a specialist within the clinic group, the specialist records are a separate provider even though all the providers work in the same clinic. Another example is The Orthopedic Specialty Hospital (TOSH). If a patient is being treated by a physiatrist but then is referred for an orthopedic evaluation or for injections from another provider all within TOSH, the records should be divided by each physician, not grouped together under “TOSH.”

Corporate owners, such as Intermountain Health Care, are not individual medical providers.

C. PUTTING TOGETHER THE EXHIBIT

Tabbing each provider's records makes it easier to review the medical records. Please create a tab for each provider. Once the records are organized, they must be paginated and an index created as the first page of the exhibit. Bind the records into an exhibit. Binding requires a front and back cover, and a two-hole clip at the top, along with a three hole punch on the left side of the records. The binder must be able to be opened and closed without coming apart. Create multiple volumes if necessary depending on the size of the exhibit.

Enclose a completed Medical Records Exhibit Checklist with the exhibit when it is filed with the Court. Once all the steps in each section have been completed, check the line next to "completed."

Records in the medical exhibit must be in the following order:

- 1) Diagnostic records
- 2) Non-hospital medical provider records
- 3) Hospital records
- 4) Physical therapy records

1. Diagnostic Records

All diagnostic records, regardless of provider, go in one tab labeled "diagnostics." Place it as the first provider group of records in the exhibit. The records must be in chronological order.

2. Non-hospital Medical Provider Records

Following the diagnostics records tab, place non-hospital medical providers' records, in chronological order, in each provider records tab. Then place each medical provider records group in chronological order within its section of the exhibit.

3. Hospital Provider Records

Place all hospital provider records, in chronological order, after the medical provider records. Then place each hospital provider records group within chronological order within its section of the exhibit.

4. Physical Therapy Records

All physical therapy records, regardless of provider, go in one tab. Place it at the end of the exhibit under a tab labeled "physical therapy." It is the last group of records in the exhibit. The records must be in chronological order.