



Arbitrator Suggested Best Practices for Document Submission

The No-Fault Arbitration panel dedicates itself to conducting hearings in an expeditious manner that is fair to all parties involved and consistent with the goals of the No-Fault system and the arbitral forum.

With this in mind, it is crucial that the claims and issues we are called upon to resolve are presented to the panel in a clear and logical manner that ensures that all issues are raised and preserved and ultimately resolved. As cases grow more complex, and given the time constraints within which hearings are conducted, well organized and clearly presented issues and evidence further the best interests of all participants – Applicants, Respondents, the AAA, and the Arbitrators – in achieving the prompt resolution of claims in a forum that is efficient and fair.

What follows are suggestions that a representative group of Arbitrators have collaborated on and offer as “best practices” for the organization and submission of evidence in the ADR Center.

The following are suggested “Best Practices” for the uniform submission and organization of evidence in the ADR Center:

Applicant’s Submission

- Cover sheet with breakdown of bills in chronological order. Please include dates, description of services and amounts. Attached are a few suggested, but not required, formats
- AR-1: Please verify accuracy of information provided therein
- Exhibit A: Bills in chronological order
- Exhibit B: Medical reports, test results, etc. in chronological order
- Exhibit C: Assignment of benefits
- Exhibit D: Misc., e.g., proofs of mailing, verification responses, rebuttal
- Exhibit E: Case law, prior arbitration awards, as deemed relevant

Respondent’s Submission

- Cover sheet identifying issues and defenses, by claim
- Exhibit A: Denials/EOBs in chronological order by date of service followed by corresponding verification requests
- Exhibit B: Evidence corresponding to defenses, i.e., peer review / independent medical examination reports, proof of policy violation, coder affidavit, etc
- Exhibit C: Medical literature, case law, prior arbitration awards, as deemed relevant

Both Parties

Things to avoid:

- Duplications of documents; relevant documents need only be submitted once
- Scan documents so that they are legible and properly oriented, i.e., right-side up