



SEPTEMBER 2021

Inside this issue:

**WE LOVE OUR
SPONSORS** 2

**MEET THE
CANDIDATES FOR THE
BOARD OF
DIRECTORS** 3

**10 TIPS FOR
SUMMARIZING
MEDICAL RECORDS** 6

**CREDENTIAL
RENEWAL REMINDER** 7

OCTOBER CLE 8

OCTOBER BIRTHDAYS 9

**WELCOME NEW
MEMBERS** 13

**MCPA MEMBER
BENEFITS** 13

OFFICERS 14

**BOARD OF
DIRECTORS** 15

COMMITTEE CHAIRS 16

Visit us at:

www.montcoparalegals.org



Editor

Lisa Lagreca

llagreca@dbdlaw.com

*The Official Publication of the
Montgomery County Paralegal Association*
www.montcoparalegals.org

IT'S ELECTION TIME!



WE LOVE OUR SPONSORS!

SAY HELLO TO OUR NEWEST SILVER SPONSOR



*Semanoff
Ormsby
Greenberg
& Torchia, LLC*

Business Lawyers Serving Business People®

thank you

MEET THE CANDIDATES FOR THE MONTGOMERY COUNTY PARALEGAL ASSOCIATION'S BOARD OF DIRECTORS!



Tracey L. Barnes, RP. Pa.C.P., is an Estates Administration and Estate Planning Paralegal. I began my career with Dischell, Bartle & Dooley, PC, in 1988 during which time I attended Pennsylvania State University, completing the Paralegal Certificate Program in the Summer of 1992. In 2000 I took the Paralegal Advanced Competency Exam and received the designation of RP (PACE Registered Paralegal) on June 6, 2000.

I have been a member of the Montgomery County Paralegal Association since its inception in 1999 and have been a Board Member for numerous years during this time. I have held the offices of Secretary, Treasurer, President and currently Vice President. During my tenure with the MCPA, I have been a continuous member of the Planning Committee and am currently the Membership Chair for MCPA as well as the CLE Coordinator.

In addition, on a state platform, in 2008 I received my certification through the Keystone Alliance of Paralegal Associations holding the credential of Pa.C.P. In 2012 I accepted the position of Credentialing Chair of the Keystone Alliance of Paralegal Associations which position includes the management of the Pa.C.P., database, organizing and overseeing a committee of wonderful paralegals who review Pa.C.P. Applications and Renewal Applications, and speaking at presentations with Pennsylvania Associations regarding the program. I have held this position continuously since 2012.

On the national platform, in 2017 I was appointed as the CLE-Associations Co-Coordinator for the National Federation of Paralegal Associations (NFPA) and re-appointed every year since. This position entails the review of CLE presentations submitted by Associations to NFPA around the country.

MEET THE CANDIDATES FOR THE MONTGOMERY COUNTY PARALEGAL ASSOCIATION'S BOARD OF DIRECTORS!



Jenn is a Family Law Paralegal at the law firm of Dischell Bartle & Dooley PC. She graduated from Peirce College in 2009 with a Bachelor of Science in Paralegal Studies and became a certified paralegal through the Keystone Alliance of Paralegal Associations in 2015. Jenn is on the Board of the Montgomery County Paralegal Association and is also the chair of its planning committee. She is also a founding Board member and is the membership chair of the Family Law Paralegals of Pennsylvania.



Jen Kozlowski is a 2011 graduate of Lehigh Carbon Community College's Paralegal Studies Program, earning her Associates degree. Following her graduation she helped Children and Youth by expediting permanency for children in the foster care system through the Statewide Legal Network. Following her time at Children and Youth she worked for a solo attorney specializing in zoning, estate planning and estate administration, and landlord/tenant law. Since moving to Montgomery County, Jen has been a Paralegal with Dischell Bartle Dooley, currently working in Workers' Compensation, personal injury, and general litigation. Jen is also the mother of 2 boys and was recently married and dog-mom to Ruby.

MEET THE CANDIDATES FOR THE MONTGOMERY COUNTY PARALEGAL ASSOCIATION'S BOARD OF DIRECTORS!



Trista Davis is a paralegal at Stradley Ronon Stevens & Young, LLP in its Malvern office. She attended Central Pennsylvania College completing the Paralegal Program and graduated in 2009. In 2014, she received her Pa.C.P. certification through the Keystone Alliance of Paralegal Association. Trista lives in Douglassville with her husband and son.



Karen D. Manzanares is a Law Clerk for Attorney Michelle A. Fioravanti and recently became a realtor. After graduating from Villanova University she spent 22 years as a law clerk for the Governor's Office, Pennsylvania Department of Transportation (PennDOT) Chief Counsel in King of Prussia.

10 Tips for Summarizing Medical Records

By Ruth Curcuru

Summarizing medical records can be a major part of a paralegal's job, yet it is one that gets little attention in the curriculum of many paralegal certificate programs. As one who has had to learn it the hard way, I'd like to offer my top 10 tips for summarizing medical records.

1. Know Your Purpose

There is a reason you are summarizing those medical records and it shouldn't be just to meet a billable hours quota.

If you are on the plaintiff's side, you are trying to figure out what medical care was made necessary by the subject incident, and what it cost. You are also trying to determine whether your law firm should finance further care (if your firm offers that).

If the doctor orders an MRI, but medical expenses to date are over half the small policy limits, there is probably nothing to be gained by the MRI, whereas for the same plaintiff, in a case with million dollar policy limits, an MRI showing herniated discs could substantially raise the value of the case and allow the firm to obtain a higher settlement for the client. You need to know the likely policy limits as well as the symptoms of a herniated disc.

If you receive records from the defense, you need to check for pre-existing conditions or past treatment for similar injuries, but those aren't a focus except to the extent that they reflect on the credibility of your client.

On the defense side, you are summarizing medical records to assemble a medical history that may show that whatever condition the plaintiff claims was caused by your incident was actually pre-existing, at least in part.

Also, if you are an insurance defense litigation paralegal you also want to know what problems are alleged, which doctors have treated the plaintiff, what their recommendations are, and whether the plaintiff has followed those recommendations. You are looking for the names of other

Defendants walk a fine line between getting buried in irrelevant minutia and missing clues that could make a difference. It may be useful to note that the plaintiff's primary care doctor never knew about the alleged injury even though the plaintiff was seen regularly for a variety of ills, so yes, you need to note that the plaintiff was seen for those ills, but no, you don't need to say more than "sore throat"—unless he mentioned that the sore throat was exacerbating his neck pain.

2. Bates Number or Bookmark

Often when you start work on a case you don't know how many medical records you will receive. However, today's PDF programs make it very easy to Bates number and/or bookmark records, and doing so should be part of your regular routine. If page 245 of 456 pages of records from hospital X mentions that the patient was complaining of back pain shooting into his leg three weeks before the accident, you don't want to have to hunt for that page before the plaintiff's deposition. Even if you are not able to Bates number, note the page in the pdf file.

See p. 10.

ATTENTION

Credential Renewal Reminder

**NFPA PACE Registered Paralegals
NFPA CRP Certified Registered Paralegals
Pa.C.P. Credentialed Paralegals**


***Are your Credentials expiring in
OCTOBER, NOVEMBER, OR DECEMBER?***

NOW is the time to submit your renewal application and proof of CLE.

For more information, visit:

RP and CRP – www.paralegals.org or Pa.C.P. – www.keystoneparalegals.org

CLE Seminar

When:	 <p>November 9, 2021 6:30 P.M. Via Zoom</p>
Topic and Speaker:	<p><i>Be Like Wonder Woman</i></p> <p><i>Presented by:</i></p> <p><i>Helen L. Gemmill, Esquire</i></p> <p><i>McNees Wallace & Nurick LLC</i></p> <p><i>**Applying for approval of CLE 1.5 (E) by NFPA and Keystone Alliance**</i></p>
Cost:	<p><u>Free</u> for MCPA Members</p> <p>\$10.00 for NFPA affiliated members (evidence required)</p> <p>\$20.00 for non-members</p>
	<p>This month, MCPA will be collecting for</p> <p>Norristown Hospital Center</p> <p>To learn more and to donate</p> <p>visit: https://hospitalitycenter.org/</p>
RSVP:	<p>To register please visit:</p> <p>https://us02web.zoom.us/meeting/register/tZYqdeCtqTspE9LN85k960sUA0LoWQgGfgp5</p> <p>For any questions, please contact:</p> <p>Jennifer Echikson, Pa.C.P.</p> <p>jechikson@dhdlaw.com</p>

OCTOBER

ROBYN POOCHIGIAN

ALEXA ROSE

MICHELLE HEDGEPEETH



AUDREY BARTKOWSKI

SHARI WEBER BRADLEY

If you are not familiar with the Bates Numbering and Bookmarking features of your PDF software, now is the time to learn. These features are generally found on the paid versions of the software, not the “reader” versions.

PRO PARALEGAL TIP: I usually number records with the plaintiff’s name or initials and the name or initials of the practice or doctor. For example, if the plaintiff is John Smith and I’m looking at Dr. Jones’ records, I will number them Smith–Jones 001 through Smith–Jones 087 for 87 pages of medical records.

3. Use a Grid and a Narrative

Generally, a sortable table in a spreadsheet is the easiest way to organize a medical records summary. Create columns for “Date”, “Provider”, “Summary”, “Bill” and “Bates”.

If there are a large number of relatively small entries from the same provider, instead of noting every \$40, \$150, and \$75 charge incurred at thrice-weekly visits, simply note the total as part of the final entry, unless, of course, the attorney wants every charge noted by date.

When records from other providers or more records from the first provider are obtained, they can be easily added to the end of the summary, and the table is sorted by date to put them in place.

Once the grid is complete, many attorneys appreciate a quick narrative, either in the form of a memo/email or as part of a letter to the client. The grid is good for showing things happening over time, but the summary narrative would read that plaintiff was treated at XYZ clinic for soft tissue injuries for twelve weeks before undergoing an MRI at Images R Us, which found a herniation at L3-4. Following that he was treated by the neurosurgeon, Dr. Cutter, who performed a fusion at General Hospital.

4. Check the Findings

The reports on most diagnostic studies, whether x-rays, CT scans, MRIs, or surgical tests like biopsies usually include descriptive paragraphs about different things shown, and then, at the bottom, a line titled “Findings”. Those findings are what need to be considered when summarizing medical records.

5. Connect the Dots

Especially for the defense side, part of the purpose of the medical summary is to connect the dots and find medical treatment not mentioned by the plaintiff in discovery.

A review of the patient information forms from various providers may give clues such as other physicians seen, other drugs taken, or even other accidents. Is the pharmacy listed on the

form the same pharmacy that is listed in the discovery responses? If the doctor's file shows surgery at the Same Day Surgery Center, do you have their records?

PRO PARALEGAL TIP: Another place to look for evidence of pre-existing problems is the plaintiff's health insurance records. Especially when reviewing records not related to the accident, check for names of health insurance companies and send them a subpoena or a request for a Detailed Claims Listing which should give you the names of the providers, the dates of treatment, and the ICD-10 codes for the condition being treated.

6. Don't Note Normal

One typical rookie mistake when summarizing medical records is to spend a lot of words recounting normal findings. The fact that the plaintiff has two legs does not belong on the medical summary, nor does the fact that he has full cervical range of motion if he is complaining of lower back pain—unless of course, he had limited cervical range of motion last month.

Many electronic medical record programs automatically bold abnormal findings. But in your role as a personal injury paralegal or an insurance defense paralegal, you can't rely on this from every medical pro-

vider.

7. Become Familiar with Local Doctors

The reality is that most litigation-related injuries are to the neck, back, and knee. While it is not impossible to injure other body parts in a way that would lead to litigation, those cases are few and far between.

Personal injury paralegals and insurance defense paralegals should become familiar with local clinics that treat accident plaintiffs as well as local orthopedists and neurosurgeons. The more familiar you are with the way practices keep their records, the more efficiently you will be able to review the records.

You will also learn that when Dr. X is thinking about surgery, he always orders tests A, B, and C, so if you see orders for them, you know what is coming.

8. Learn About Medications

Besides health insurance records, the best place to "go fishing" for information about a plaintiff's medical history is her/his prescription records. These records can lead you to additional records if you are familiar with what the medications are typically prescribed for.

See p. 12.

If the plaintiff filled prescriptions for Naproxen and Cyclobenzaprine written by a doctor who does not come up on a Google search, the chances are high that he/she was seen in the emergency room by a resident for some type of soft tissue injury—now you just have to figure out which emergency room.

Norco plus Amoxicillin generally equals toothache. Periodic prescriptions for Sumatriptan (or any drug ending in triptan) likely means a history of migraine headaches.

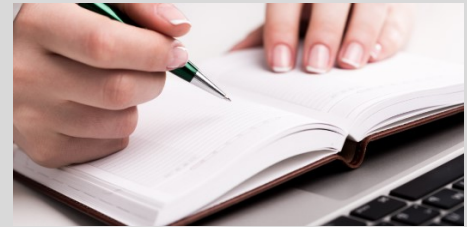
When reviewing pharmacy records, look up any drug with which you are not familiar. “Red Flag” drugs are muscle relaxants, narcotics, psychiatric medications, and anti-inflammatories.

9. Learn the Important Buzz Words

In determining what is important when summarizing medical records, having a list of things to look for helps. Often legal cases involve separating pre-existing or degenerative problems from those caused by trauma. Words like “fissure”, “herniation”, “rupture”, “tear”, “ecchymosis” and “fracture” denote trauma while “osteophyte”, “arthritis”, and “osteoarthritis” are degenerative conditions.

The more familiar you are with terms

frequently used by doctors who treat plaintiffs in your type of practice, the easier medical summaries will become.



10. Make Friends with Google

Do you know what the sternocleidomastoid is? What about the navicular bone? How is your tympanic membrane today? Do you have spondylosis or spondylolisthesis?

Medical professionals use a lot of terms that are not in common use, not to mention acronyms or abbreviations — DX, RX, ROM—are just a few. Google can translate most of them for you when you are summarizing medical records.

Conclusion

As with most other paralegal skills, practice makes perfect when preparing medical summaries. You may not have any medical training, but with repetition and taking the time to learn about the medical conditions frequently encountered in your practice, you will become better and better at changing a mountain of medical records into a molehill-sized medical summary.♦

Curcuru, Ruth, “10 Tips for Summarizing Medical Records”, Paralegal Boot Camp, Paralegal Brief, October 2021.

WELCOME NEW MEMBERS

Julia Martin—Semanoff Ormsby Greenberg & Torchia, LLC

Justin Royer—Student member/Peirce College

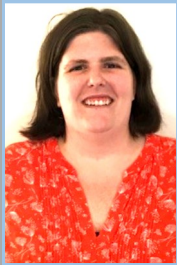
Christopher Healy,—Associate Member

MCPA Professional and Student members enjoy these benefits:

- ◇ Receive MCPA's bi-monthly newsletter MCPA Today;
- ◇ Access the MCPA job bank;
- ◇ Access MCPA List Serv where paralegals can get advice and assistance in all areas of practice;
- ◇ Monthly meetings or Seminars dealing with topics that affect paralegals today;
- ◇ Obtain the annual MCPA Membership Directory;
- ◇ Automatic membership in the National Federation of Paralegal Associations (NFPA);
- ◇ Subscription to the National Paralegal Reporter, the official bi-monthly magazine of the NFPA;
- ◇ Network with paralegals and other members of the legal community.
- ◇ Stay on top of local and national trends in your career! Join MCPA today by visiting

[www.MCPA -BECOME A MEMBER.org](http://www.MCPA-BECOME A MEMBER.org)

OFFICERS

**Dana Jorna, Pa.C.P.—President**

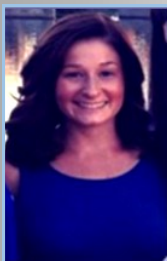
Kane, Pugh, Knoell, Troy & Kramer
(610) 275-2000
MCPAPres@gmail.com

Dana is a Litigation Paralegal at the law firm Kane Pugh Knoell Troy & Kramer, LLP. She has been a member of the Montgomery County Paralegal Association since 2013, and a board member since 2018. More recently, she has become the MCPA's Job Bank Coordinator and co-chair of the Community Outreach & Pro Bono committee.

**Tracey Barnes, Pa.C.P.—Vice President**

Dischell Bartle & Dooley P.C.
(215)362-2474
MCPAvp@gmail.com

Tracey is a Paralegal at the law firm of Dischell Bartle & Dooley P.C. in its Lansdale office. She has been an active member since the organizations inception in 1999 and has been a Board Member, Secretary, Treasurer and President. She is currently the Keystone Alliance of Paralegal Associations Credentialing Chair. In 2017, she was appointed as the CLE-Associations Co-Coordinator for the National Federation of Paralegal Associations (NFPA).

**Trista Davis—Treasurer**

Stadley Ronon Stevens & Young, LLP
(610) 640-7960
MCPAbursar@gmail.com

Trista is an Trust and Estate Paralegal at Stradley Ronon Stevens & Young, LLP in its Malvern office. She attended Central Pennsylvania College completing the Paralegal Program and graduated in 2009. In 2014, she received her Pa.C.P. certification through the Keystone Alliance of Paralegal Association. Trista lives in Douglassville with her husband and son.

**Deborah L. Arbuckle, Pa.C.P.—Secretary**

Kaplin Stewart Meloff Reiter & Stein
(610) 941-2573
MCPAsteno@gmail.com

Deb is a Paralegal at the law firm Kaplin Stewart Meloff Reiter & Stein in its Blue Bell office. She has been a member of the Montgomery County Paralegal Association since 2003, serving as a board member from 2007 through 2011. Debbie has also co-chaired the MCPA Marketing Committee and currently co-chairs the Pro Bono and Community Outreach Committee. She has served as the primary delegate for the MCPA to the National Federation of Paralegal Associations for 10 years.

BOARD OF DIRECTORS

Noreen Messmer, Pa.C.P.



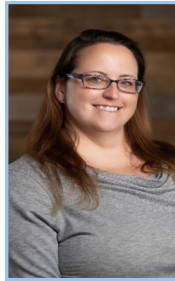
Noreen is a Paralegal with the law firm of Ford & Buckman, P.C. in Blue Bell and has worked with Sarah Ford, Esquire for over 40 years. She has been a Board member since 2010 and also serves on the Hospitality/Planning Committee. Noreen lives in Blue Bell and is the mother of three and Nana to three granddaughters.

Lisa Effrig Lagreca



Lisa is a Paralegal at the law firm of Dischell Bartle & Dooley P.C. in its Lansdale office. She recently graduated Summa Cum Laude from BCCC Paralegal Program and currently attends Pierce College. Lisa is a mother of four and grandmother of two. She has been a member of the MCPA since 2018 and is its newsletter editor.

Jennifer L. Echikson, Pa.C.P.



Jenn is a Family Law Paralegal at the law firm of Dischell Bartle & Dooley P.C. in its Lansdale office. She graduated from Peirce College in 2009 with a Bachelor of Science in Paralegal Studies. She became a certified paralegal through the Keystone Alliance of Paralegal Association in 2015. Jenn is on the planning and outreach committees for the MCPA and is also membership chair of the Family Law Paralegals of Pennsylvania.

Nancy Piechota, Pa.C.P.



Nancy is a Certified Paralegal at the law firm of Mannion Prior, LLP in King of Prussia. Nancy sits on the Board of Directors and also serves as Chair of the Marketing Committee. She was the past Vice President of Keystone Alliance and is the Primary Delegate to the Keystone Alliance for Montgomery County Paralegal Association. Nancy also served as the past President of the MCPA.

Karen D. Manzanares



Karen is a Law Clerk for Attorney Michelle A. Fioravanti and recently became a realtor. After graduating from

Villanova University she spent 22 years as a law clerk for the Governor's Office, Pennsylvania Department of Transportation (PennDOT) Chief Counsel in King of Prussia.

COMMITTEE CHAIRS

BAR LIAISON	Annette M. Long-Tulio, CRP, Pa.C.P. amlong83@gmail.com
CLE COORDINATOR	Tracey L. Barnes, RP, Pa.C.P. tbarnes@dbdlaw.com
COMMUNITY OUTREACH & PRO BONO	Dana Jorna, Pa.C.P. MCPAPres@gmail.com
HOSPITALITY & EVENTS PLANNING	Jennifer Echikson jechikson@dbdlaw.com
JOB BANK COORDINATOR	Victoria Molloy vmolloy@eastburngray.com
KEYSTONE ALLIANCE DELEGATES	Primary: Nancy Piechota, Pa.C.P. npiechota@mansionprior.com Secondary: Deborah Long, Pa.C.P. deblong420@gmail.com
MARKETING	Nancy Piechota, Pa.C.P. npiechota@mansionprior.com
MEMBERSHIP	Tracey L. Barnes, RP, Pa.C.P. tbarnes@dbdlaw.com
NEWSLETTER	Lisa Effrig Lagreca lagreca@dbdlaw.com
STUDENT AFFAIRS & MENTORING	Laura O'Halloran lpohalloran520@gmail.com
NFPA DELEGATES	Primary: Deborah A. Arbuckle, Pa.C.P. Darbuckle@kaplaw.com Secondary: Dana Jorna, Pa.C.P. MCPAPres@gmail.com
PUBLIC RELATIONS	Jennifer Echikson jechikson@dbdlaw.com
SOCIAL MEDIA	Christopher Gregg cgregg@kanepugh.com
STUDENT LIAISONS	Peirce College: Bucks County Community College: Lisa Effrig Lagreca llagreca@dbdlaw.com
WEBMASTER	Shari Weber Bradley, Pa.C.P. swbradley@delucalevine.com