**What to Accomplish Before you Negotiate and Settle a Case**

* [ ]  Have call with Client to confirm all treatment providers, confirm all dates of service, discuss reasoning for any gaps in treatment.
* [ ]  Do full medical record review to confirm all of client’s injuries (check for serious injuries)
* [ ]  Confirm wage loss (How much time missed, what was approved by doctor, confirm exactly how much wage loss to the dollar)
* [ ]  Obtain and use detailed client story in negotiations.
* [ ]  Confirm if client is still in pain or if client is fully healed.
* [ ]  Create accounting and update it as you get new offers.
* [ ]  Communicate new offers to client (make sure case managers are accomplishing this)
* [ ]  Confirm balance verifications are completed for all providers (HI liens, PIP, L&I etc.)
* [ ]  Try to reduce medical bills if possible/necessary and send PIP Subrogation waivers (Get Supervisor approval)
* [ ]  Try to get an understanding of client settlement expectations, what do they want in their pocket?
* [ ]  Be sure to leave yourself a $10,000-$20,000 buffer for settlement for non-commercial cases and a $50,000 - $100,000 buffer for commercial cases – when you have signed accounting from client, work to obtain more money to surprise client.
* [ ]  Get accounting signed and settlement approved by client before requesting final offer and release.
* [ ]  Confirm all claims relating to property damage is resolved.

