



MEDTRON
SOFTWARE INTELLIGENCE



032610 NEWS BLAST

ARE YOU MEETING SIGNATURE REQUIREMENTS?

Due to recent and upcoming Comprehensive Error Rate Testing (CERT) audits, CMS has detailed new rules on signatures in Transmittal 327 to the Medicare Program Integrity Manual. All signatures provided must meet the standard requirements or you risk an auditor rejecting your claims and demanding you make costly repayments. Medical records including physician orders and prescriptions without valid signatures used to support a paid claim can be rejected by CERT auditors and the claim will be denied for lack of medical necessity, per the *March 22, 2010 edition of the Part B News*.

All providers need to review the guidelines below and continue to follow-up periodically to ensure they are signing medical records with legible signatures and following all requirements.

CMS **acceptable** signatures:

1. Provide a legible full signature (a readable first name and last name).
2. Provide a legible first initial and last name.
3. Write an illegible signature over a typed or printed name.
4. Write an illegible signature on letterhead with information indicating the identity of the signer.
Example: There's an illegible signature appearing on a prescription.
Solution: The letterhead of the prescription lists three physician names, one of which is circled – thus indicating the identity of the signer.
5. Use an illegible signature accompanied by a signature log or attestation statement.
6. Write initials over a typed or printed name.
7. Write initials not over a typed or printed name, but accompanied by a signature log or attestation.
8. Neglect to sign a portion of a handwritten note, but other entries on the same page in the same handwriting are signed.

NOTE: Signature requirements written in national and local coverage determinations supersede CMS's signature requirements.

NOTE: Some exceptions apply to the above requirements; review Medicare Transmittal 327 for exceptions.

CMS **unacceptable** signatures:

1. Use an illegible signature not over a typed name or on a letterhead, without a signature log or attestation state.
2. Write initials, but leave out a typed name without a signature log or attestation.
3. Forget to sign a typed note that includes the provider's typed name.
4. Neglect to sign a typed note that does not include the provider's typed or printed name.
5. Neglect to sign a handwritten note with no other entries on the page.
6. Use the words "signature on file" in lieu of a signature.
7. Use a signature stamp.

Modifying Medical Records:

Anytime a change and/or addition is made to the medical record, an addendum or annotation should be included to explain why the change was made as well as the date and signature of individual making the change.

Medicare Transmittal 327: www.cms.hhs.gov/transmittals/downloads/R327PI.pdf

WHAT YOU NEED TO DO:

All providers need to review the above information and confirm all medical records contain an acceptable signature, as well as review the Medicare transmittal for further details.