

Memo

To: Primary Care Physicians
From: Dr. William Whibbs, M.D.
CC: Jenny Caillouet
Date: 3/6/2009
Re: **SIGNATURE STAMPS ARE NOT ACCEPTABLE**

With such paradigm shifts taking place in the health-care industry worldwide, documentation and verifying the actual provider on medical record documents is essential for the *continuity of care and proper reimbursement for the condition of the patient.*

CMS Signature Guidelines for all services provided/ordered:

- Legible hand written signature with physicians' credentials; **Signature STAMPS ARE NOT ACCEPTABLE** to sign an order or other medical record documentation for medical review purposes. (*Please refer to Medicare Transmittal 248 Signature Requirements*)
- Electronic Signature; If you have an Electronic Health Record (EHR)/Electronic Medical Record (EMR), and the software prints your name and credential, it will still have to say "electronically verified by..." or something equivalent included in the wording of the sign-off. Not all EHR/EMR's are set up to provide appropriate wording, but usually that is an easy fix, so if there are questions, check with your vendor.

CMS requirements for signature verification have always been a guideline. As our industry is facing changes, the guidelines are being enforced.

I know what you all are thinking, but this just has to be done; it likely will only come up in the context of some kind of audit, and, believe me, that's not the time to start thinking about it. Medicare is currently auditing several aspects of care for Medicare enrollees in the state of Florida, so the harsh reality is not far off.

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| CMS Manual System | Department of Health & Human Services (DHHS) |
| Pub 100-08 Medicare Program Integrity | Centers for Medicare & Medicaid Services (CMS) |
| Transmittal 248 | Date: MARCH 28, 2008 |
| | Change Request 5971 |

SUBJECT: Signature Requirements Clarification

I. (Rev. 248; Issued: 03-28-08; Effective Date: 09-03-07; Implementation Date: 04-28-08)

B. Signature Requirements

Medicare requires a legible identifier for services provided/ordered. The method used *shall* be hand written or an electronic signature (*stamp signatures are not acceptable*) to sign an order or other medical record documentation for medical review purposes.

NOTED EXCEPTION: *Facsimile of original written or electronic signatures are acceptable for the certifications of terminal illness for hospice.*

Providers using electronic systems should recognize that there is a potential for misuse or abuse with alternate signature methods. *Facsimile and hard copies of a physician's electronic signature must be in the patient's medical record for the certification of terminal illness for hospice.* For example, providers need a system and software products which are protected against modification, etc., and should apply administrative procedures which are adequate and correspond to recognized standards and laws. The individual whose name is on the alternate signature method *and the provider* bears the responsibility for the authenticity of the information being attested to. Physicians should check with their attorneys and malpractice insurers in regard to the use of alternative signature methods.