



University of California  
San Francisco

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# Physician Signature Requirements

Important Information About  
Signature Requirements for ***Every***  
Service Provided or Ordered.

UCSF Clinical Enterprise Compliance Program

2012

**The Centers for Medicare & Medicaid Services (CMS) issued Change Request 6698 to clarify how Medicare claims review contractors assess claims and medical documentation submitted by providers.**

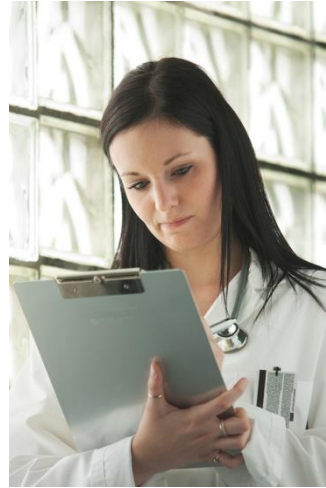
**The effective date was March 1, 2010 with an implementation date of April 16, 2010.**

## The purpose of a rendering/ treating/ ordering practitioner's signature in patients' medical records

- operative reports
- orders
- test findings, etc.

is to demonstrate that services submitted to Medicare for payment have been accurately and fully documented, reviewed and authenticated.





**Furthermore, it confirms that the provider has certified the medical necessity and reasonableness for the service(s) submitted to the Medicare program for payment consideration.**

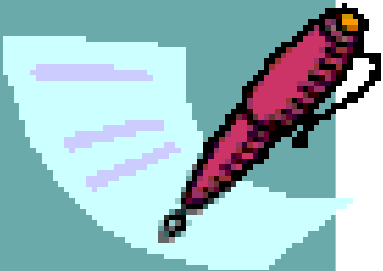
**For medical review purposes, Medicare requires that services provided/ordered be authenticated by the author.**

- ***The method used shall be a hand written or an electronic signature.***
- ***The signature must be personally applied, not signed by someone for the ordering provider.***
- ***Stamp signatures are not acceptable.***



# Acceptable Written Signatures:

- Legible first initial and last name
- Illegible signature over a typed or printed name
- Initials over a typed or printed name





**If the signature is illegible, ACs, MACs, PSCs, ZPICs and CERT shall consider evidence in a *signature log* or *attestation statement* to determine the identity of the author of a medical record entry.**

# ACRONYMS

**AC – Affiliated Contractors**

**CERT – Comprehensive Error Rate Testing**

**MAC – Medicare Administrative Contractors**

**PSC – Program Safeguard Contractor**

**ZPIC – Zone Program Integrity Contractor**



# Acceptable Electronic Signature Examples:

- **'Electronically signed by John Smith, M.D.'**
- **'Authenticated by John Smith, M.D.'**
- **'Authorized by: John Smith, M.D.'**



# Acceptable: Digital Signatures

**Digital signatures** are an electronic method of a written signature that is typically generated by special encrypted software that allows for sole usage

# EXCEPTIONS to the Physician Signature Requirement:

- **Facsimiles are acceptable for the certification of terminal illness for hospice.**
- ***Some* orders do not need to be signed.**
  - Per Medicare requirements, orders for clinical diagnostic tests are not required to be signed.

# A General Word about: Orders

- An “order” is a communication from the treating physician/practitioner requesting that a diagnostic test be performed for a beneficiary. The order may conditionally request an additional diagnostic test for a particular beneficiary if the result of the initial diagnostic test ordered yields to a certain value determined by the treating physician/practitioner (e.g., if test X is negative, then perform test Y). An order may be delivered via the following forms of communication:
- A written document signed by the treating physician/practitioner, which is hand-delivered, mailed, or faxed to the testing facility;

# Orders - Continued

- **NOTE: No signature is required on orders for clinical diagnostic tests paid on the basis of the clinical laboratory fee schedule, the physician fee schedule, or for physician pathology services;**
  - A telephone call by the treating physician/practitioner or his/her office to the testing facility; and
  - An electronic mail by the treating physician/practitioner or his/her office to the testing facility.

## Orders - Continued

- If the order is communicated via telephone, both the treating physician/practitioner or his/her office, and the testing facility must document the telephone call in their respective copies of the beneficiary's medical records. While a physician order is not required to be signed, the physician must clearly document, in the medical record, his or her intent that the test be performed.

**If the ordering provider's signature is missing from an order that requires one: ACs, MACs, PSCs, ZPICs and CERT shall disregard the order during the review of the claim.**

**This means that the reviewer will make the claims review determination using only the other submitted documentation.**

**If the signature is missing from any other medical documentation, ACs, MACs, PSCs, ZPICs and CERT shall accept a signature attestation from the author of the medical record entry.**

**NOTE: Only the author of the medical record in question may create the attestation statement.**



# Signature Attestation Statement Example

**“I, \_\_\_[full name of physician/practitioner]\_\_\_, hereby attest that the medical record entry for \_\_\_[date of service]\_\_\_ accurately reflects signatures/notations that I made in my capacity as \_\_\_[provider credentials, e.g., M.D.]\_\_\_ when I treated/diagnosed the above listed Medicare beneficiary. I do hereby attest that this information is true, accurate and complete to the best of my knowledge and I understand that any falsification, omission, or concealment of material fact may subject me to administrative, civil, or criminal liability.”**

**If AC, MAC or CERT reviewers identify a pattern of missing/illegible signatures it shall be referred to the appropriate PSC/ZPIC for further development.**



# RESOURCES

- **CMS CR 6698 Signature Guidelines for Medical Review Purposes – March 2010**
- **Palmetto GBA – Jurisdiction 1 – Part A – Medicare Medical Records Signature Requirements Acceptable and Unacceptable Practices –**  
<http://www.palmettogba.com/Palmetto/Providers.nsf/docsCat/Jurisdiction%201%20Part%20A~Articles~General~Medicare%20Medical%20Records%20Signature%20Requirements%20Acceptable%20and%20Unacceptable%20Practices?open&Expand=1>
- **Samples:**  
[http://www.palmettogba.com/Palmetto/Providers.Nsf/files/J11\\_Signature\\_Requirements\\_Acceptable\\_Examples.pdf/\\$File/J11\\_Signature\\_Requirements\\_Acceptable\\_Examples.pdf](http://www.palmettogba.com/Palmetto/Providers.Nsf/files/J11_Signature_Requirements_Acceptable_Examples.pdf/$File/J11_Signature_Requirements_Acceptable_Examples.pdf)
- **CMS Regs and Guidance – 3.3.2.4 – Signature Requirements**  
– <http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/pim83c03.pdf>



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# Questions ?

**Contact: 415/514-2790**