

Medical Documentation Policy Number C-1200

<i>Department(s)</i>	<i>Compliance</i>
<i>Effective Date</i>	10/08/2014
<i>Version Number</i>	V2
<i>Last Review</i>	07/01/2022

Scope

All National Seating & Mobility policies and procedures apply to all owners, directors, officers, and employees of NSM and all related entities equally unless otherwise indicated.

Purpose/Policy Introduction

NSM obtains many documents requested by payers to support the medical need for equipment or repairs. These documents are also intended to verify who evaluated the client or inspected the equipment and made the decision that the equipment or repair was needed. The medical professional, ATP, RTS or technician who actually evaluated the client can provide personal knowledge of the client's needs obtained during the evaluation; other NSM staff who did not evaluate the client would not be qualified to provide that information.

Delivery tickets and other documents that require a client or their representative's signature are intended to confirm that the client received equipment or services, and/or that they agree to and understand the process or their responsibility in a part of the process. NSM employees cannot represent the client or their representative at any time, as this would constitute a conflict of interest.

For any documents that require a signature, no matter the intent, signing another person's name or making changes to a signed document without the written acknowledgment of the change by the person who originally signed the document is never acceptable and is considered fraudulent. Using documents that have been completed, altered or obtained in a non-compliant manner would be considered fraud and would be in violation of the False Claims Act. Any type of fraudulent behavior will not be tolerated and will result in disciplinary action up to and including termination.

Entering a note in the work order explaining the change provides clarification in the event of an audit or review of the order.

As outlined in our Credit Policy, NSM must meet all documentation requirements for every payer on every work order. All required documents must be created, completed and corrected following the payers' policies.

Policy

For payers that require documents signed by a medical professional, such as a prescription (Rx) or Letter of Medical Necessity (LMN) signed by a physician or therapist, the appropriate medical professional must sign the document. NSM employees may not sign those documents nor alter the signed documents in any way. If a change or correction is needed, and is allowed by the payer, the person who originally signed the document must approve the alteration, and they must make, initial and date the change.

For documents, or sections of documents, that must be written by the medical professional, such as justification of medical necessity or progress notes, NSM employees must not write nor enter the information nor act as a scribe for the professional. Any information on a document that is presented as the work of the physician, therapist or other medical professional, must be completed by that professional.

In cases where the payer allows NSM representatives to sign or complete sections of a Letter of Medical Necessity (LMN) or other documents that support the need for equipment or repairs, the LMN or other documents may only be completed and signed by the ATP, RTS or technician who was present at the evaluation for the equipment or repairs. The signature of the ATP, RTS or technician may not be made by any other person on their behalf.

Documents that require a signature from a client or their representative, may not be signed by NSM employees on their behalf. Once a document is signed, NSM employees may not make changes to the document without the approval of the person who signed the document. If a change or correction is needed, and is allowed by the payer, the person who originally signed the document must approve the alteration, and they must initial and date the change.

Forging a signature on any document will result in disciplinary action, up to and including termination.

Entering information or making changes to a signed document without the permission and dated initials on the change from the person who originally signed or completed the document will result in disciplinary action, up to and including termination. Making corrections electronically, cutting, copying and pasting, using correction fluid or tape on signed documents is not allowed and will also result in disciplinary action up to and including termination.

When a date is intended to indicate when the document was signed, the actual signature date must be used. NSM employees may not direct anyone to use a date other than the date the document was actually signed. Requesting a date other than when the document was actually signed could be considered backdating and will result in disciplinary action up to and including termination.

When documents are received from a client or clinician, they must be reviewed for accuracy and completeness. If it appears that any information or corrections were made by someone other than the client or clinician, the document must be returned for clarification.

NSM employees may not direct clients or their authorized representative to make specific selections on documents which require a decision, such as an Advance Beneficiary Notice (ABN) or Rent to Purchase (RTP) Letter. NSM employees may explain what each option means but cannot recommend or require a selection. Selections may not be pre-filled on these documents by NSM employees. NSM employees may also not direct clients on what date to enter on these forms.

If a correction or alteration to a signed document was needed and was obtained according to policy, a note explaining the reason for the change must be entered into the notes section of the work order.

Procedure

Any Rx, LMN or other document that requires a signature should be obtained from the appropriate medical professional, ATP, RTS or technician, as indicated by the payer requirement. Any document that requires a signature from the client or their representative should be presented to the client or their representative at the appropriate stage of the transaction cycle. The signature must be made by the medical professional, the ATP, RTS or technician, or by the client or their representative, as appropriate.

If a change or correction to any signed document is needed and is allowed by the payer, the document that needs a change or correction must be returned to the original signer for their initials and the date they approved the change or correction. NSM employees, other than the ATP, RTS or technician if they were the original signer of the document, must not sign for the medical professional or for the client or their representative, and must not add the initials and date approving any change.

Any information that needs to be corrected or altered must be lined through in such a way that the original information is still legible. The updated information must be written adjacent to the original information. Correction fluid or tape of any kind should not be used on a signed document under any circumstances. Electronic corrections, including cutting, copying and pasting, are also not allowed.

Once signed, the document should be scanned into the appropriate work order. If the signed document required a correction or alteration that was approved by the original signer, a note providing the reason for the change should be entered into the work order. The completed signed document is to be maintained in accordance with the Document Retention Policy.

If a Delivery Ticket or Checklist was not properly obtained or completed at delivery and a correction needs to be made, a note should be entered in the work order reflecting the changes needed and the date the client actually received the equipment. The actual delivery date should be noted on the Delivery Ticket or Checklist.

If other required documents were not obtained at or prior to delivery, such as an ABN or RTP Letter, they must be signed and dated following the policy and may not be backdated.

References/Resources

NSM Credit Policy – see WNSM

Definitions

Term	Definition
Letter of Medical Necessity	Document prepared by clinicians or ATPs if allowed by the Payer to document medical need for equipment
Delivery Ticket	Document providing proof of delivery for equipment
Delivery Checklist	Document providing proof of instruction and other items required by NSM internally to meet our requirements and those of our accrediting agency

Policy History

Creation/Revision/Review Date	Author/Reviewer	Approved by	Description
10/08/2014	Compliance	Compliance	Initial Policy Created
July 2020	Compliance	Compliance	Clarification of Corrections