



CMS Signature Requirements



For medical review purposes, Medicare requires that the person(s) responsible for the beneficiary's care, including providing, ordering, and certifying items and services, be identifiable. Signatures are required upon medical review for two distinct purposes:

1. To satisfy specific signature requirements in statute, regulation, national coverage determination (NCD), or local coverage determination (LCD); and,
2. To resolve authenticity concerns related to legitimacy or falsity of documentation.

Medical record authorship is generally accomplished through a handwritten or an electronic signature. Stamp signatures are not typically acceptable.

Medicare contractors will consider the totality of the medical record when reviewing for compliance with signature requirements.

HANDWRITTEN SIGNATURE

A handwritten signature is a mark or sign by an individual on a document to signify knowledge, approval, acceptance, or obligation.

SIGNATURE LOG

A signature log lists the typed or printed name of the author associated with initials or an illegible signature. The signature log might be included on the actual page where the initials or illegible signature are used or might be a separate document. The provider should also list his/her credentials in the log.

SIGNATURE ATTESTATION STATEMENT

A signature attestation statement may be submitted to authenticate an illegible or missing signature on medical records and orders. In order to be considered valid for Medicare medical review purposes, an attestation statement must be signed and dated by the author of the medical record entry or order and must contain sufficient information to identify the beneficiary.

Reviewers will consider all attestations that meet CMS requirements regardless of the date the attestation was created, except in those cases where the regulations or policy indicate that a signature must be in place prior to a given event or a given date. (Note that a signature attestation statement for a standard written order will be considered when the attestation statement has been obtained by the supplier prior to claim submission. When the order is required prior to delivery of the item[s], the signature attestation statement will be considered if the attestation statement has been obtained by the supplier prior to delivery of the item[s].)

The following page contains an acceptable form that suppliers may choose to use as an attestation statement. In regard to signature attestation statements for orders, the sample form language provided on the following page may need adjusted to better address the document type (order) for which the attestation has been created. CMS and CGS are neither requiring nor instructing suppliers to use this form or format.



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ELECTRONIC SIGNATURES

Due to the potential for misuse or abuse with alternate signature methods, providers should use 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 bear the responsibility for the authenticity of the information being attested to.

Please refer to the CMS Pub. 100-08, *Medicare Program Integrity Manual*, Chapter Three – Section 3.3.2.4 for additional information concerning signature requirements.

MEDICAL RECORD SIGNATURE ATTESTATION STATEMENT

NOTE: This form provides a suggested format for a signature attestation statement. Submission of a signature attestation statement and use of this form is optional.

Name of Patient:	
Medicare Number:	

I, _____, hereby attest that the
Print full name of the physician/practitioner.
medical record entry for _____ accurately reflects signatures/
Date of service.
notations that I made in my capacity as a(n) _____ when
Insert credentials, e.g. M.D.
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.

Signature of Author of the Medical Record

Date

In order to be considered valid for Medicare medical review purposes, an attestation statement must be signed and dated by the author of the medical record entry. Reviewers will not consider attestation statements where there is no associated medical record entry or someone other than the author (even a partner in the same group practice) of the medical record entry in question signs this statement.



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