Healthcare provider signature requirements

Medicare requires that medical record entries for services provided/ordered be authenticated by the person responsible for the care of the beneficiary, in accordance with Medicare's policies. The method used shall be a handwritten or electronic signature. Stamped signatures are not acceptable. Beneficiary identification, date of service and provider of the service should be clearly identified on the documentation. Providers should not add late signatures to the medical record, beyond the short delay that occurs during the transcription process. Instead, providers should make use of the signature authentication process.

Handwritten signature
A handwritten signature is a mark or sign by an individual on a document signifying knowledge, approval, acceptance or obligation. If the signature is illegible or missing from the medical documentation, then a signature attestation from the author of the medical record entry is acceptable. The guidelines below will assist in determining whether to consider the signature requirements met.

Electronic signature
Providers using electronic systems need to recognize that there is a potential for misuse or abuse with alternate signature methods. The individual whose name is on the alternate signature method and the provider bear the responsibility for the authenticity of the information for which an attestation has been provided.

** If electronic signatures are used as a form of authentication, the system must authenticate the signature at the end of each note. Some examples of acceptable electronic signatures are: "Electronically signed by," "Authenticated by," "Approved by," "Completed by," "Finalized by" or "Validated by," and include the practitioner's name, credentials and the date signed.

If the signature requirements are not met and a record is audited, the reviewer will conduct the review without considering the documentation with the missing or illegible signature.

References:
CMS Medicare Program Integrity Manual (Publication [Pub.] 100-08), Chapter 3, Section 3.3.2.4
*** CMS 2008 Risk Adjustment Data Technical Assistance for Medicare Advantage Organizations Participant Guide, 7.2.4.2*

		Signature requirement met	Contact billing provider and ask a nonstandardized follow-up question
1	Legible full signature	X	
2	Legible first initial and last name	X	
3	Illegible signature over a typed or printed name Example:  John Whigg, M.D.	X	
4	Illegible signature where the letterhead, address or other information on the page indicates the identity of the signatory Example: An illegible signature appears on a prescription. The letterhead of the prescription lists three physicians' names. One of the names is circled.	X	
5	Illegible signature NOT over a typed/printed name and NOT on letterhead, but the submitted documentation is **accompanied** by a signature log or an attestation statement	X	
6	Illegible signature NOT over a typed/printed name, NOT on letterhead and the documentation is **unaccompanied** by a signature log or an attestation statement Example: 		X
7	Initials over a typed or printed name	X	
8	Initials NOT over a typed/printed name but **accompanied** by a signature log or an attestation statement	X	
9	Initials NOT over a typed/printed name **unaccompanied** by a signature log or an attestation statement		X
10	Unsigned typed note with a provider's typed name Example: John Whigg, MD		X
11	Unsigned typed note without a provider's typed or printed name		X
12	Unsigned handwritten note, the only entry on the page		X
13	Unsigned handwritten note where other entries on the same page in the same handwriting are signed	X	
14	"Signature on file"		X