

Acceptable Orders for Imaging Procedures

CMS recently published a transmittal which provides specific requirements associated with authenticating orders for tests. To encourage and implement best practice for our orders, we will be utilizing these guidelines for all payors. Questions you may have:

QUESTION: Are stamped signatures acceptable in test orders?

ANSWER: No, they are not. CMS has confirmed that services provided and ordered must be authenticated by the author. The method used shall be a hand written or an electronic signature. Stamped signatures are not acceptable.

QUESTION: May staff sign orders for or as the ordering provider verifying that they have taken a verbal order from that provider?

ANSWER: No, they may not. Your staff may create the order, but services ordered must be authenticated by a hand written or electronic signature of the provider.

QUESTION: Will my patients be turned away if they do not have a validly signed order?

ANSWER: Your patients will not be turned away, but their service will be delayed until a validly signed order is received. We will contact you as quickly as possible to get a validly signed order to minimize any delays for your patients.

QUESTION: How will you handle studies scheduled to occur after normal business hours when our office is closed and unavailable for confirmation of the order and my patient presents without a validly signed order?

ANSWER: If the order is otherwise straight-forward, but missing a valid signature, we will perform your patient's study when outside of normal operating hours. However, we will contact you as quickly as possible the next business day to get a validly signed order.

QUESTION: How do these clarified requirements apply to me as I care for my own patients?

ANSWER: These updates clarify long-standing signature requirements and how they will be interpreted by government program auditors. The requirements apply to all services provided to government program beneficiaries and are not unique to diagnostic tests, so they are applicable to your practice if you see Medicare patients. You may want to review these guidelines as they apply to your own practice.

Please see the following references for more information on signature requirements:

- <http://www.cignagovernmentservices.com/partb/claims/cert/SignatureTips.pdf>
- <http://www.cms.gov/transmittals/downloads/R327PI.pdf>
- <http://www.cms.hhs.gov/manuals/downloads/pim83c03.pdf>

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When it comes to proper signatures, here's a few quick things to remember:

- Always sign your orders —submitted records with just a typed signature/signature line with no handwritten or electronic signature is not acceptable.
- You may print your name along with your written signature for clarification.
- Initials **must also** have a printed name for clarification—when a note is from an inpatient setting, a full signature is preferred along with a printed name.
- Notes that have been transcribed should always be reviewed and signed—either electronically or with a hand-written signature—by the author of the note.
- Signatures should be legible

Acceptable forms of signatures

• Legible handwritten signatures or initials

Note: Handwritten signatures should be legible and the reviewer must be able to determine whose signature is used. Stamped signatures are not acceptable.

• Electronic signatures

Electronic signatures should contain date and timestamps and include printed statements, e.g., “electronically signed by,” or “verified/reviewed by” followed by the practitioner’s name and preferably a professional designation.

Note: The responsibility and authorship related to the signature should be clearly defined in the record.

• Digitized signature

An electronic image is an individual’s handwritten signature reproduced in its identical form using a pen tablet.

Note: This is an actual real-time signature done electronically, like the digital sign-out with a credit card transaction.

Your Signature Matters...



Important information about new ordering requirements.

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A joint message from your imaging providers



Questions about the new requirements?



Raleigh Radiology Business Office
919-781-1437



WR Express Scheduling
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UNACCEPTABLE SIGNATURES

(According to CR 6698):

- Signature ‘stamps’ alone in medical records are not recognized as valid authentication for Medicare signature purposes.
- Reports or any records that are dictated and/or transcribed, but do not include valid signatures ‘finalizing and approving’ the documents are not acceptable.
- Illegible signature NOT over a typed/printed name, NOT on letterhead and the documentation is unaccompanied by:
 - 1) a signature log, or 2) an attestation statement
- Initials NOT over a typed/printed name unaccompanied by:
 - 1) a signature log, or 2) an attestation statement
- Unsigned typed note with provider’s typed name
- Unsigned typed note without provider’s typed/printed name
- Unsigned handwritten note, the only entry on the page

UNACCEPTABLE ELECTRONIC SIGNATURES

(According to Cigna Government Services):

- ‘Signing physician’ when provider’s name is typed
Example: Signing physician: _____ John Smith, M.D.
- ‘Confirmed by’ when a provider’s name is typed
Example: Confirmed by: _____ John Smith, M.D.
- ‘Signed by’ followed by provider’s name typed and the signing line above but done as part of the transcription.
- ‘This document has been electronically signed in the _____ department’ with no provider name.
- ‘Dictated by’ when provider’s name is typed
Example: Dictated by: _____ John Smith, M.D.
- ‘Signature On File’
- ‘Filled By’
- ‘Electronically signed by agent of provider’

ACCEPTABLE HANDWRITTEN SIGNATURES

(According to CR 6698):

- Legible full signature
- Legible first initial and last name
- Initials over a typed or printed name
- Illegible signature over a typed or printed name
- Illegible signature where the letterhead, Addressograph 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 3 physicians’ names. One of the names is circled.
- Illegible signature NOT over a typed/printed name and NOT on letterhead but accompanied by: 1) a signature log, or 2) an attestation statement
- Initials NOT over a typed/printed name and NOT on letterhead but accompanied by: 1) a signature log, or 2) an attestation statement
- Unsigned handwritten note where other dated entries on the same page in the same handwriting are signed

ACCEPTABLE ELECTRONIC SIGNATURES

(According to Cigna Government Services):

- ‘Electronically signed by’ with provider’s typed name
- ‘Electronically verified by’ with provider’s typed name
- ‘Reviewed by’ with provider’s typed name
- ‘Authenticated by’ with provider’s typed name

PARAPHRASED FROM CMS BENEFITS AND POLICY MANUAL

Order

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 that is hand-delivered, mailed, or faxed to the testing facility; 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; however Medicare requires that services provided/ordered be authenticated by the author. The signature for each entry must be legible and should include the practitioner’s first and last name. For clarification purposes, it is recommended that you include applicable credentials, e.g., PA, DO, or MD.

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 have been accurately and fully documented, reviewed and authenticated. Furthermore, it confirms the provider has certified the medical necessity and reasonableness for the service(s) submitted to the Medicare program for payment consideration.

Medicare Requirements for Valid Signatures

The CMS Internet Only Manual outlines signature requirements for Medicare purposes:

- “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. Stamp signatures are not acceptable.”
- CMS and its contractors are now “strictly enforcing” these long-standing requirements.

More info? Publication 100-8, Chapter 3, Section 3.4.1.1, <http://www.cms.hhs.gov/manuals/downloads/pim83c03.pdf>

CMS Transmittal 327 (Change Request 6698), released March 16, 2010 clarifies acceptable forms of signatures:

- Legible handwritten signature
- Illegible handwritten signature, if signature can be confirmed/identified as specified in CR 6698
- Valid electronic (or E-) signature
- Digitized signature
- Stamped signatures are **NEVER** accepted!
- Reiterates that documentation for all items or services order/referred must have a signature.
- Distinguishes between an order and any other medical documentation – if signature is missing from an order, the order is disregarded.

More info?

<http://www.cms.gov/transmittals/downloads/R327Pl.pdf>

Acceptable Signature Examples

Legible full signature	
Legible first initial and last name	
Illegible signature over a typed name	
Illegible signature where the letterhead, Addressograph or other information on the page indicates the identity of the signer.	
Illegible signature NOT over a typed/printed name and NOT on letterhead, but the submitted documentation is accompanied by: 1) a signature log, or 2) an attestation statement	
Initials over a typed or printed name	

Initials NOT over a typed/printed name but accompanied by: 1) a signature log, or 2) an attestation statement	John Whigg MD
Unsigned handwritten note where other entries on the same page in the same handwriting are signed.	Not applicable to imaging orders

Example Signature Attestation Statement

Providers will sometimes include in the documentation they submit an attestation statement. 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 and must contain sufficient information to identify the beneficiary.

Should a provider choose to submit an attestation statement, they may choose to use the following statement:

“I, _____ [print full name of the physician/practitioner] _____, hereby attest that the medical record entry for _____ [date of service] _____ accurately reflects signatures/notations that I made in my capacity as _____ [insert 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.”