

Part B Insider (Multispecialty) Coding Alert

Documentation: CMS: Physician Signature Not Required for Diagnostic Tests

New clarification trumps previous advice

In an attempt to clear up confusion about who can request a diagnostic test, a recent transmittal outlining the requirements has unfortunately had the opposite effect, leaving practices scratching their heads.

Several years ago, CMS altered its rules governing physicians' signatures for requiring diagnostic tests. The change, however, never made its way into Medicare's Internet Only Manual, leaving providers confused regarding which advice to follow.

To streamline its advice, CMS issued Transmittal 94 on Aug. 29. The transmittal covers the differences between "treating physicians" and "ordering physicians," and discusses when you must have a physician's signature on file and when you don't need one.

For example: The missive informs practices that a physician's signature is not 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."

CMS also clarified the long-confusing term "physician order."

"Many practices consider an order a written piece of paper, but that isn't always the case," says **Heather Corcoran** with **CGH Billing** in Louisville, Ky.

Reality: A physician order is "a communication from the treating physician/practitioner requesting that a diagnostic test be performed for a beneficiary," the transmittal says.

The order can be hand-delivered, mailed, or faxed to the testing facility if the physician has written it down. However, CMS notes that the order can also be communicated via telephone or email.

"If you give a testing order on the phone, both the ordering and treating physicians have to make sure to document it in the patient's medical record," says **Jay Neal**, an Atlanta-based coding consultant.

Signature debate: Although many coders dispute this fact, CMS clearly says in its transmittal that the physician order need not be signed; however, the physician must document his intent that the test be performed.

To read the transmittal, go online to <http://www.cms.hhs.gov/transmittals/downloads/R94BP.pdf>.