

Part B Insider (Multispecialty) Coding Alert

Part B Mythbuster: Your Practitioner's Signature Could be Worth \$3,800-Or More

Avoid the most common Part B signature myths to avoid denials.

Although you might not think your physician's signature is as attractive as John Hancock's, the reality is that it could be worth thousands of dollars to your practice. As we reported earlier this month (Insider v 16 n 16), Part B MAC WPS Medicare recently cited missing signatures as one of the most common errors among the payer's audited claims, and that issue alone prompted scores of refund requests.

For example, WPS mentioned seeing subsequent observation care (99225) claims that were missing signatures and were therefore denied. If you make this mistake just once a week, you're costing your practice nearly \$3,800 annually.

You can ensure a hassle free practice by meeting the compliance standards for physician signatures. This should be a basic minimum best practice at your practice to keep your claims flowing smoothly. Check out the following common signature myths and be sure to avoid them so you can continue collecting your practice's cash.

Myth 1: Stamped Signatures Are Just Fine for Everyone

You may already know that CMS signature requirements can be found in section 3.3.2.4 of chapter 3 of the Medicare Program Integrity Manual. But what you may not realize is that you can't simply rubber stamp all of your doctors' documentation and count that as if the records had actually been signed, unless you meet one exception.

Medicare requires that services provided/ordered be authenticated by the billing physician for medical review purposes, and it typically has to be a hand written or an electronic signature. "Stamped signatures are only permitted in the case of an author with a physical disability who can provide proof to a CMS contractor of an inability to sign due to a disability," CMS says in the MLN Matters booklet *Complying with Medicare Signature Requirements*.

Myth 2: You Can Sign the Record When You 'Get Around to It'

The billing or ordering physician should not add late signatures to the medical record □ beyond the short delay that occurs during the transcription process, CMS says. Instead, he could make use of the attestation process if necessary.

"If the practitioner's signature is missing from the medical record, submit an attestation statement from the author of the medical record," the agency advises. "Your contractor may offer specific guidance regarding addenda to medical records." In addition, many of the Part B payers share sample attestation statements on their websites.

The instructions for signature attestation statement mechanism include, the following, from MLN Matters article MM6698:

- An attestation statement must be signed and dated by the author of the medical record entry.
- An attestation statement must contain sufficient information to identify the beneficiary.
- An attestation statement must be associated with a medical record entry and must be by the author of the medical record entry in question.
- In cases where two individuals are in the same group, one may not sign for the other in medical record entries or attestation statements.
- Reviewers will consider all attestations that meet the guidelines 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.

Myth 3: You Must Retrain Doctors With Illegible Signatures

If your physicians' signatures are so messy that a reviewer wouldn't be able to read them, then an auditor may deem them non-existent. However, before you try to retrain your practitioners on how to sign more neatly, you can take the simple step of creating a signature log, which could save your payments on an audit.

What it means: "A signature log is a typed listing of the provider(s) identifying their name with a corresponding handwritten signature," CMS says in *Complying with Medicare Signature Requirements*. Essentially, you'll type the name of each practitioner, and they'll sign next to their names. You can submit the signature log any time you need to support the identity of a practitioner's illegible signature. It shows that this is how the practitioner has always signed his name.