

Eli's Rehab Report

Reader Questions: Signed and Dated -- But Not Stamped, Says New CMS Policy

Question: I have a question regarding the CMS publication 100-08 released last March, which references physicians' signatures on the certification of terminal illness for hospice. The transmittal says CMS is no longer accepting stamped signatures, but it appears as if the language is applying this rule to all settings, even though the title of the transmittal indicates hospice settings. So does the requirement for no stamped signatures apply only to terminal illness for hospice, or does it extend to all therapy settings? If it does apply to other settings, are there any restrictions on electronic signatures?

Connecticut Subscriber

Answer: In March, CMS issued a transmittal whose title referred to stamped signatures for hospice services. And yes, in that transmittal, under section 3.4.1.1, the language indicated settings other than hospice -- which caused confusion for therapy providers. To clarify the meaning, the American Physical Therapy Association (as well as other organizations) contacted CMS, and the agency's response over the phone was that the use of stamped signatures is no longer valid for any service -- not just hospice. So these new guidelines do include therapy services, both inpatient and outpatient. We're just waiting to see if CMS will release a revision to the old transmittal.

What this means for you: Effective April 28, stamped signatures will no longer be acceptable on any documentation that could be reviewed by your Medicare contractor. And as for whether electronic signatures are still allowed, the answer is yes. In fact, CMS will accept three types of signatures: those signed in pen, faxed signatures, or electronic signatures. The key to remember is just no stamped signatures.