

## **OASIS Alert**

## **Documentation: Say Goodbye To Date Stamp For Physician Signatures**

New stricter guidelines will require physicians to date signatures themselves starting Jan. 1.

On top of face to face encounter changes straining your relationships with your referring physicians in the new year, you soon will have to get tough with docs about dating their own signatures.

The **Centers for Medicare & Medicaid Services** "has clarified that physicians must sign and date hospice certifications and home health Plans of Care, verbal orders, and certifications," regional home health intermediary Cahaba GBA says in a notice on its website. "This changes Cahaba's longstanding policy of accepting a date stamp as proof of timeliness in lieu of a physician dating his/her signature." Deadline: "This change is effective for all claims submitted on or after January 1, 2011," Cahaba says.

CMS told contractors about its interpretation in a conference call in mid-November, the **National Association for Home Care & Hospice** says in its member newsletter.

It's not over: CMS cited regulatory references for the new interpretation, but "failed to reference longstanding policy found in the home health plan of care instructions that permits fixing the date of receipt of signed orders in lieu of physicians dating their signatures," NAHC maintains. Earlier this year, CMS had assured NAHC that date stamping the signature was fine, but recently reversed its call.

"Physicians fail to date certifications and recertifications as frequently as 25 percent of the time," NAHC worries.

"Requiring the physician date as the only acceptable documentation will create additional burden and cost both on providers that must resend undated forms and physicians who will need to view forms for a second time in order to determine the date of their signature and affix that date to the forms."

"NAHC will continue to lobby CMS to allow home health and hospice providers to affix the date of receipt as proof of physician signature timing -- just as they have done over the past two decades," the trade group says.

Meanwhile, HHAs should gear up to educate physicians on the new rule, experts advise.