

Reminder: Provider signatures on patient notes are essential for claims processing

Following a visit with a patient in any discipline, a signature is the crucial last piece in completing a visit note. Whether it be an electronic medical record or handwritten one, this final step has a large impact on claims processing when medical records are needed for review. Without a signature, it can result in a denied claim due to lack of authenticity and/or legitimacy of the record.

Below are guidelines set forth by our regulatory agencies on signature requirements:

Wis. Stat. § 137.15 provides for legal recognition of electronic records, signatures, and contracts. It outlines the parameters of signing electronic medical records. Additional information can be found at <https://www.dhs.wisconsin.gov/publications/p02770.pdf>

Wis. Stat. § 137.11(8) defines “Electronic signature” to include “an electronic sound, symbol, or process attached to or logically associated with a record and executed or adopted by a person with the intent to sign the record”. Thus, an electronic signature could be created by scanning a signed document and including the scanned image or entry of a “signature” via use of the consumer’s adopted image, symbol, or personal identification number (PIN). Additional information can be found at <https://www.dhs.wisconsin.gov/publications/p02770.pdf>

Security Health Plan: Per the Documentation of Care information provided in the Provider Manual, Security Health Plan’s record documentation standards state that “All entries in the medical record have author identification”. Additional information can be found at [Provider manual: Documentation of Care \(securityhealth.org\)](Provider%20manual%3A%20Documentation%20of%20Care%20(securityhealth.org))

BadgerCare Plus and Medicaid: Electronic signatures – acceptable when a handwritten signature is not required. This can include the complete typed name of the provider, a personal identification number (PIN), or their initials. The electronic signature must be under the sole control of the rendering provider and only the rendering provider or designee may have the authority to use it. Additional information can be found at <https://www.forwardhealth.wi.gov/WIPortal/Subsystem/KW/Print.aspx?ia=1&p=1&sa=50&s=1&c=3&nt=Policy+Requirements+for+Use+of+Electronic+Signatures+on+Electronic+Health+Records>

Physician stamped signatures – Under specific conditions, Wisconsin Medicaid accepts physicians’ stamped signatures on orders, plans of care, and prior authorizations. The provider must keep a dated statement with the physician’s original signature attesting that

they are the only person who possesses or uses the signature stamp. The signature stamp is considered invalid by Wisconsin Medicaid if this is not met. You can find additional information at

<https://www.forwardhealth.wi.gov/WIPortal/Subsystem/KW/Print.aspx?ia=1&p=1&sa=47&s=3&c=183&nt=>

Medicare: "Signature" is defined as "a mark or sign by the ordering or prescribing physician or non-physician practitioner (NPP) made on a document satisfying the knowledge, approval, acceptance, or obligation" of a medical record. A signature is required on all medical records for Medicare patients "to resolve authenticity concerns related to legitimacy or falsity of the documentation". Additional information can be found at

<https://www.cms.gov/mln905364-complying-with-medicare-signature-requirements> and

<https://www.ngsmedicare.com/web/ngs/search-details?lob=96664&state=97006&rgion=93624&selectedArticleId=954883>

Electronic signatures are the preferred route for signing medical records. To ensure compliance with security standards set forth by the Health Insurance Portability and Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH), please visit <https://www.hhs.gov/hipaa/index.html> and <https://www.hhs.gov/hipaa/for-professionals/special-topics/hitech-act-enforcement-interim-final-rule/index.html>