



Information for Healthcare Improvement



# Expedited Appeal Connection

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## *CMS Signature Guidelines*

The Centers for Medicare & Medicaid Services (CMS) uses transmittals to communicate new or changed policies or procedures that will be incorporated into the CMS Online Manual System. Transmittal 327 outlines signature guidelines contractors need to follow when reviewing medical record documentation and payment of claims. It applies to all Medicare contractors, including Medicare administrative contractors and recovery audit contractors. It also includes useful guidance for providers by specifically outlining what contractors will accept as a signature and when contractors need to query the provider for additional information.

The Transmittal also instructs contractors to disregard unsigned orders. When an unsigned order is found during a review, it does not appear that contractors will have the option of requesting additional information from the provider to substantiate the claim, as CMS has indicated that an unsigned order will be considered invalid. CMS permits the following as acceptable means of authentication:

- Electronic signature;
- A legible, handwritten signature, including the author's first and last name; and
- Additional documentation such as a signature key, signature log, or an attestation statement submitted with the medical record to support an illegible or unclear signature. (CMS includes a proposed attestation statement on page 11 of the Transmittal).

Pages 12 and 13 of the Transmittal contain a table that lists the actions contractors will take in response to specific signature situations. For more information, *click here*.



## *CMS Notice 10095—Notice of Medicare Non-coverage*

CMS has not yet published the updated version of this form. Per the CMS website, “The current versions of the Medicare notices/instructions posted below, under ‘Downloads,’ are valid until any updates to these notices are published. Plans should continue using the notices below, notwithstanding the listed August 31, 2010 expiration date, until new versions are posted. Please check this webpage for any updates to these documents.” This information can be found at [www.cms.gov/BNI](http://www.cms.gov/BNI), then click MA ED notices.

*For more information about this newsletter or  
for questions about the appeal process, contact:  
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*Remember, the educational trainings are still  
available at <http://edu.flqio.org>. There is one  
Continuing Education (CE) credit available for  
taking a course.*

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