



Complying with Medicare Signature Requirements



What's Changed?

Note: No substantive content updates.

Medicare claims reviewers look for signed and dated medical documentation of those responsible in providing care for the Medicare patient to meet Medicare's billing and coverage policies' signature requirements. If the entries don't meet the signature requirements, we may deny the associated claims.

How do we define a handwritten signature?

It's a mark or sign the ordering or prescribing physician or non-physician practitioner (NPP) makes on a document signifying knowledge, approval, acceptance, or obligation.

When are signatures required for medical review?

There are 2 distinct purposes for which we require signatures:

1. To satisfy specific signature requirements in statute, regulation, national coverage determination, or local coverage determination
2. To resolve authenticity concerns related to legitimacy or falsity of the documentation

What if I use a scribe when documenting medical record entries?

If a scribe dictates the entry on your behalf, sign the entry to effectively authenticate the documents and the care you provided or ordered. You don't need to document who transcribed the entry.

Note: We don't require the scribe sign or date the documentation.

What should I do if I didn't sign an order or medical record?

You can't add late signatures to orders or medical records (beyond the short delay during the transcription process). We don't accept retroactive orders.

If your required signature is missing from the medical record (other than an order), send an attestation statement. We accept a signature attestation for medical documentation, except orders. The attestation must be associated with a medical record and created by the author. Attestations may be considered, regardless of their creation date, unless the regulation or policy indicates the signature must be in place before a given event or date.

Your [Medicare Administrative Contractor](#) may offer specific guidance on signature attestation statements, including whether current laws or regulations allow attestation for missing signatures in certain situations.

Do I need to redocument a medical student's documentation of an Evaluation & Management (E/M) visit before I sign the record?

If you rely on the medical student's documentation, you don't need to redocument the E/M service, but you must review and verify (sign and date) the student's medical record entry.

What if I signed the order or progress note but my signature isn't legible?

You or your organization may send a signature log or attestation statement to support the identity of any illegible signatures. We accept a printed signature below the illegible signature in the original record.

What's a signature log?

A signature log is a typed listing of physicians and NPPs showing their names with a corresponding handwritten signature. This is an individual log or a group log. A signature log shows signature identity throughout the medical record. We encourage, but don't require, physicians and NPPs to list their credentials in the log so the reviewers won't deny a claim for missing credentials.

What if I don't have a signature log in place?

You or your organization may create a signature log at any time. CMS contractors accept all sent signature logs regardless of the date you created them.

Can I avoid delays in claim reviews by sending a signature log or signature attestation with my documentation?

We encourage you to send a complete medical record with proper signature documentation first to avoid medical review delays. This includes a signature log or attestation if needed.

Must I date my signatures?

Documentation must have enough information to show the date you ordered or performed the services. If you dated the entries immediately above and below an undated entry, medical reviewers may reasonably assume the entry date in question.

What are the medical review guidelines for using electronic signatures?

The medical review guidelines for using an electronic signature are:

- Systems and software products must include protections against modification, and you should apply administrative safeguards that meet all standards and laws
- The individual's name on the alternate signature method and the provider accept responsibility for the authenticity of attested information
- Check with your attorneys and malpractice insurers before using alternative signature methods

Resource

[Section 3.3.2.4 of the Medicare Program Integrity Manual, Chapter 3](#)

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