MEDICARE RECORD AUTHENTICATION – TIPS FOR CLINICIANS

Revised June 2024

Dear Clinician,

It is common practice for practitioners and other members of a medical team to sign their medical record documentation and orders. For Medicare’s medical review purposes, it is required that the person(s) responsible for the beneficiary’s care, including providing, ordering, and certifying items and services, be identifiable.

Medical record authorship is generally accomplished through a handwritten or electronic signature (signature stamps are not typically acceptable). When the author of a record is unclear, it may result in a claim denial and the inability of the durable medical equipment, prosthetics, orthotics, and supplies (DMEPOS) supplier to provide the necessary item(s) to accomplish your treatment goals. Signature logs and signature attestation statements are two acceptable methods to authenticate a record or order. (Note: The use of a signature attestation statement for authentication of an order is acceptable in limited circumstances.)

Signature Logs

Medicare contractors recommend that practitioners consider preparing a single-page signature log or "key" to include when responding to requests for documentation. A signature log identifies the author(s) associated with initials or "illegible" signatures within a set of medical records. When a practitioner’s office receives a request for copies of a beneficiary's medical record, the signature log may then be included and returned to the requestor. This will help prevent follow-up contacts from suppliers and auditing entities for signature verification.

Attestation Statements

In some cases, a medical record or order omits a signature and, therefore, may require the author to attest to the authenticity of the record or order. To be considered valid for Medicare medical review purposes, an attestation statement must be signed and dated by the author of the medical record entry or order, and must contain sufficient information to identify the beneficiary. Should a provider choose to submit an attestation statement, they may choose to use the following statement:

“[I, __][print full name of the physician/practitioner] hereby attest that the medical record entry for ___[date of service]___ accurately reflects signatures/notations that I made in my capacity as ___ [insert provider credentials, e.g., M.D.] when I treated/diagnosed the above listed Medicare beneficiary. I do hereby attest that this information is true, accurate and
complete to the best of my knowledge and I understand that any falsification, omission, or concealment of material fact may subject me to administrative, civil, or criminal liability."

While this sample statement is an acceptable format, CMS is neither requiring nor instructing providers to use a certain form or format. The above format has not been approved by the Office of Management and Budget (OMB) and therefore it is not mandatory. Note that in regard to signature attestation statements for orders, you may find that the sample statement language provided above should be adjusted to better address the document type for which the attestation has been created.

**Electronic Signatures**

Medicare contractors recommend that an electronic signature be accompanied by a statement indicating that the signature was applied electronically. Some examples of electronic signature notations include (not all-inclusive):

- Electronically signed by
- Authenticated by
- Approved by
- Completed by
- Finalized by
- Signed by
- Validated by
- Sealed by

Notations such as those listed above indicate to the reviewer that the author’s name, typically applied in typed format, was electronically signed.

Sincerely,

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<th>Noridian Healthcare Solutions Medical Directors</th>
<th>CGS Administrators Medical Directors</th>
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