

## Original Signature Requirements

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Providers are reminded that clinical documentation must contain proper original signatures. In addition, services provided via telehealth must comply with the [Office of Mental Health and Substance Abuse Services \(OMHSAS\)](#) guidance regarding consents and signatures. CBH Clinical Management has been receiving IBHS Written Orders with prescriber signatures that do not appear to be original. CBH Program Integrity has also been noting insufficient signatures in audit findings.

Improper signatures include:

- ➔ Handwritten signatures copied and pasted within and between member records
- ➔ Photocopied signatures
- ➔ Microsoft Word documents with typed script fonts
- ➔ Electronic signatures with no corresponding DocuSign or electronic medical record (EMR) or electronic health record (EHR) verification
- ➔ Timestamped signatures created before or during the corresponding service
- ➔ For telehealth services only, writing “verbal consent given” without an associated auditable trail (written signatures must be obtained for in-person services.)
- ➔ Writing “verbal consent given” without a corresponding explanation as to why a written signature could not be obtained

Improper signatures have been noted on multiple types of documents including, but not limited to, written orders, consents for treatment, progress notes, treatment plans, and encounter forms. All CBH providers are reminded that per Medicaid regulations, [55 Pa. Code § 1101, General Provisions](#), signatures must be original:

**§ 1101.66a. Clarification of the terms “written” and “signature”—statement of policy.**

*(a) The term “written” in § 1101.66(b) (relating to payment for rendered, prescribed or ordered services) includes orders and prescriptions that are handwritten or transmitted by electronic means.*

*(b) Written orders and prescriptions transmitted by electronic means must be electronically encrypted or transmitted by other technological means designed to protect and prevent access, alteration, manipulation or use by any unauthorized person.*

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*(c) The term “signature” in § 1101.66(b)(2) includes a handwritten or electronic signature that is made in accordance with the Electronic Transaction Act (73 P. S. § § 2260.101—2260.5101).*

Providers using EMRs/EHRs must ensure that they are able to create an auditable trail, which may be requested by CBH and/or other oversight entities to authenticate signatures.

The CBH Program Integrity Department may recoup payments made for services for which signatures:

- ➔ Are unable to be verified as original
- ➔ Are altered by provider staff, such as the use of “Wite-Out,” and/or copying and pasting of signatures
- ➔ Are signed prior to end of the session
- ➔ Have written orders signed prior to the face-to-face assessments

Referrals may also be made to the [PA DHS Bureau of Program Integrity](#), Office of Attorney General’s Medicaid Fraud Control Unit, and/or relevant licensing boards.

Please review your policies and procedures to ensure that your written orders, progress notes, treatment plans, consents for treatment, encounter forms, and all other clinical documents contain original signatures. Questions regarding this notice can be directed to the CBH Program Integrity Department at [CBH.compliancecontact@phila.gov](mailto:CBH.compliancecontact@phila.gov).