

COMPLIANCE RECOMMENDATIONS FOR SIGNING NOTES

Presented by the Oversight Committee

Note: Medicare requires that all office notes be signed within 48 hours of the patient's appointment. The following policy constitutes MEAC's policy for penalty of physicians who fail to comply with this requirement.

Step 1: The EHR Administrator will monitor the "Unsigned Notes" task lists. If a note remains unsigned for 7 days, the EHR Administrator will contact the office manager by email, and will copy the chairman of the department and the physician whose note(s) remain unsigned. If the individual departments would like these emails to be forwarded to someone other than the chairman and the office manager, they are to contact the Compliance Officer with an appropriate contact person(s).

Step 2: The office manager/chairman will provide counseling to the offending provider. If deemed necessary by the clinic chair/office manager, an education session will be scheduled so that an EHR team member can provide one-on-one training to the provider. The provider will be informed that they have 3 weeks to complete their unsigned notes.

Step 3: During the third week, if the notes remain unsigned, the department chair will meet with the provider and explain that if the notes have not been completed by the end of the week, their charges will be held until their notes have been signed.

Step 4: The office will be informed to hold charges for the provider's visits until their notes have been signed and the Compliance Officer has confirmed full compliance. The Compliance Officer will let the billing department know when they can begin billing the provider's charges.

For physicians on guarantee, it is recommended that Step 4 above be replaced with:

The office will be informed to block the provider's schedule until their notes have been completed. The Compliance Officer will let the office know when the provider's schedules can be unblocked.