

From: [Alison Strasser](#)
To: [Regional Compliance Committee](#)
Subject: Signature Date-Time Stamp Expectations
Date: Monday, April 5, 2021 11:05:00 AM
Attachments: [image001.png](#)

Good Morning,

In January 2021, the SWMBH Corporate Compliance Committee made a determination on an appeal of the LADD Medicaid Services Verification Audit FY20Q4 findings. The committee came to a decision of the following, which is to be the expectation **for all providers using an EMR listing the date and time of the service documentation signature**:

Per SWMBH Operating Policy 12.11 Clinical Documentation: Service documentation or progress notes must be completed and be part of the customer record within a reasonable time period after the delivery or service, and prior to the submission of the claim or encounter. In three cases, the service documentation was completed prior to the end of the service delivery. **Service documentation must be completed (signed) within 15 minutes of the end of the service encounter.**

This expectation is for all services billed using per unit reporting. Recoupments may be issued if the signature date time stamp results in less units than what was billed. For example: A T1005 claim for 20 units. The service was rendered on 7/21/2020 from 3:00pm to 8:00pm and the signature date time stamp shows the documentation was signed on 7/21/2020 at 6:35pm. The signature time stamp results in 85 minutes of service not having documentation; therefore a recoupment of 5 units would be appropriate.

Additionally, for those providers using an EMR that has "Entered By" with the service provider name & a date with that name has been deemed acceptable as an electronic signature & signature date per the SWMBH Corporate Compliance Committee.

Please share this information with providers using EMRs with time-stamps for the service provider signature.

Feel free to reach out if you have any questions or concerns.

Thank you,

Alison Strasser, MPA

Compliance Specialist II

Southwest Michigan Behavioral Health

Office: 269-488-6981

Fax: 269-203-2600

Compliance Hotline Number: 1-800-783-0914

www.swmbh.org

[encrypt]



CONFIDENTIALITY: This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employer or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

If you have received this communication in error, please notify the sender immediately by telephone and delete the material from your computer. Thank you for your cooperation.