



Date: February 13, 2020
To: Nursing Facility Providers
Subject: Information Letter No. 20-05
Signatures on and Alterations to the Nursing Facility Specialized
Services Signature Pages

The purpose of this letter is to remind nursing facilities (NFs) of the requirements related to signatures on and alterations to the nursing facility specialized services (NFSS) signature pages. When requesting durable medical equipment (DME), customized manual wheelchairs (CMWC), or habilitative therapies through the Preadmission Screening and Resident Review (PASRR) program, an NF must ensure the NFSS signature page is signed and dated by the appropriate persons in the appropriate order, the Health and Human Services Commission (HHSC) can verify the signatures, and the NFSS signature page is not altered.

Signature and dates on the NFSS Signature Page

After a therapist completes the assessment, the following must occur:

- (1) The therapist who conducted the assessment signs the [NFSS Therapist, Referring Physician and NF Administrator CMWC/DME Signature Page](#) or the [NFSS Therapist, Referring Physician and NF Administrator Therapy Signature Page](#) depending on the equipment or service being requested. The date of the therapist's signature must be on or after the date of the assessment.
- (2) The referring physician reviews the assessment and, if the referring physician agrees with the therapist's recommendation, signs the NFSS signature page attesting to the resident's medical necessity for the habilitative therapy, DME, or CMWC. Only a physician can attest to medical necessity. As a result, an advanced practice registered nurse cannot sign in place of the physician. The date of the physician's signature must be on or after the date of the therapist's signature.

All signatures must be original, handwritten signatures. HHSC will not accept typed, copied, or stamped signatures. HHSC **will** accept digitally signed signatures with a date/time stamp.

Because the signature dates cannot be changed in the LTC Online Portal once the NF submits a request, the NF must ensure signature dates are in the correct order before the NF enters them into the portal. Furthermore, the NF must ensure the signature dates on the NFSS signature page match what is entered in the portal. To ensure these requirements are met, the NFSS signature page should be completed before the NF enters the NFSS request in the portal.

Signature Verification

To approve a request for DME, a CMWC, or habilitative therapies, the HHSC reviewer must be able to verify that all the signatures match the names entered on the NFSS form in the portal. The HHSC reviewer can verify that a signature matches if the signature is legible and matches the name on the NFSS form in the portal. If the signature is illegible, the HHSC reviewer may ask the NF to provide verification that the signature belongs to the individual identified on the NFSS form in the portal. If the HHSC reviewer cannot verify one or more signatures, the request will be placed in pending denial or denied status.

No Alterations to the NFSS Signature Page

Alterations to the NFSS signature page make it invalid. Examples of alterations that invalidate a signature page include the use of white out, cutting and pasting, and blacking out information. Alterations will result in the request being placed into pending denial or denied status. Altering the form is considered Medicaid fraud. Repeated instances of alterations will be referred to the Office of Inspector General for investigation.

To correct errors, an NF may draw a single line through a mistake, write the correction next to it, and initial and date the correction.

For questions regarding this information letter, please contact the PASRR Unit by email at PASRR.Support@hhsc.state.tx.us

Sincerely,

[Signature on file]

Haley Turner
Deputy Associate Commissioner
Intellectual and Developmental Disabilities

CC: Sylvia Hernandez Cauffman, Inspector General
Office of Inspector General