



If a conflict arises between a Clinical Payment and Coding Policy and any plan document under which a member is entitled to Covered Services, the plan document will govern. If a conflict arises between a Clinical Payment and Coding Policy and any provider contract pursuant to which a provider participates in and/or provides Covered Services to eligible member(s) and/or plans, the provider contract will govern. "Plan documents" include, but are not limited to, Certificates of Health Care Benefits, benefit booklets, Summary Plan Descriptions, and other coverage documents. Blue Cross and Blue Shield of IL may use reasonable discretion interpreting and applying this policy to services being delivered in a particular case. Blue Cross and Blue Shield of IL has full and final discretionary authority for their interpretation and application to the extent provided under any applicable plan documents.

Providers are responsible for submission of accurate documentation of services performed. Providers are expected to submit claims for services rendered using valid code combinations from Health Insurance Portability and Accountability Act approved code sets. Claims should be coded appropriately according to industry standard coding guidelines including, but not limited to: Uniform Billing Editor, American Medical Association, Current Procedural Terminology, CPT® Assistant, Healthcare Common Procedure Coding System, ICD-10 CM and PCS, National Drug Codes, Diagnosis Related Group guidelines, Centers for Medicare and Medicaid Services National Correct Coding Initiative Policy Manual, CCI table edits and other CMS guidelines.

Claims are subject to the code edit protocols for services/procedures billed. Claim submissions are subject to claim review including but not limited to, any terms of benefit coverage, provider contract language, medical policies, clinical payment and coding policies as well as coding software logic. Upon request, the provider is urged to submit any additional documentation.

## Medical Record Documentation

**Policy Number: CPCP029**

**Version 1.0**

**Clinical Payment and Coding Policy Committee Approval Date: November 5, 2024**

**Plan Effective Date: November 5, 2024**

## Description

This policy is to help ensure submission of medical record documentation is pertinent, accurate, complete, and legible for all services performed.

## Documentation

The plan reserves the right to request supporting documentation to determine eligible reimbursement. Submission of any code should be supported by medical documentation. Claims that lack proper coding and documentation may result in a denial and non-payment.

### **Illegible, Missing or Incomplete Signatures**

Medical records submitted to substantiate services rendered or ordered must be appropriately signed and credentialed.

Acceptable signatures include handwritten signatures, initials over a typed or printed name, or authenticated electronic signatures. An electronic signature usually contains a date and timestamp, and a printed statement, such as, "electronically signed by" or "verified/reviewed by," followed by the practitioner's name and professional designation. Stamped signatures are not acceptable, nor are indications that a document has been, "signed but not read."

The credential of the provider rendering the service must be listed somewhere on the medical record; either following the signature, in the typed or printed name, or in the letterhead area of the record.

### **Time-based services documentation**

For time-based services, ensure that the documentation contains the duration (e.g., start and stop times – preferred by the Plan), the issues addressed, and the signature of the service provider.

### **Timeliness of documentation**

It is expected that documentation will be generated at the time a service is rendered or as soon as practicable after it is provided to maintain an accurate medical record. A reasonable expectation would be to complete documentation no more than 24-48 hours away from the service itself. Delayed entries within a reasonable time are acceptable for purposes of clarification, error correction, addition of information not initially available, or if unusual circumstances prevented the generation of the note at the time of service. Anything after 48 hours may be considered unreasonable, as providers cannot be expected to recall specifics of services rendered after time has passed. Providers should comply with this requirement and complete documentation in a timely manner. Additionally, entries should never be made in advance of a service being rendered.

### **Inappropriately altered or addended medical records**

The medical record cannot be altered. Any errors identified after the original record is complete must be legibly corrected in a manner that allows the reviewer to identify what is being corrected and why.

If you need to make a correction (late entry) to a written medical record, you should never write over, erase, or delete the original entry. You should draw a single line through the erroneous information, leaving the original entry still legible. Sign or initial and date the deletion and include a reason for the correction above or in the margin or within the correction. Document the correct information with the current date and signature or initial.

Electronic records should follow the same principle of being able to identify the original entry, the correction, the date and time of the correction, the reason the record is being corrected and the person making the correction. Any hard copies of the electronic record must show the original entry and the correction.

An addendum is used to add information to a record that was not available at the time of the original entry. Addendums should be added timely as the provider must be able to recall the details of the patient encounter. Addendums should be an exception rather than a routine for the practice.

To properly addend a medical record, the provider must, at a minimum, include the following details in the medical record:

- A statement indicating that the entry is an addendum
- The date and time the record is being amended
- The details of the amended information
- The signature of the provider writing the addendum

### **Templated, Copy and Paste or Cloned Medical Records**

Templates can be useful tools; however, providers should use caution when using templated language. The Plan discourages templates that provide limited options and/or space for the collection of information, such as checkboxes, predefined answers, choices to be circled etc. Templates that just elicit selected information for reimbursement purposes are often not sufficient to demonstrate that coverage and coding requirements have been met. Templates may also encourage over- documentation to meet these requirements even when services were not medically necessary or were not even delivered.

Templates also make every patient visit or treatment appear the same. Each medical record must be specific to the individual patient. The reviewer of the chart must be able to discern the patient's condition and services. Atypical patients may have multiple problems or additional interventions

that must be documented in detail.

Documentation is considered cloned, copied and pasted, or carried forward when each entry in the medical record for a patient is worded exactly alike or similar to the previous entries or when medical documentation is exactly the same from patient to patient. It would not be expected that every patient had the exact same problem, symptoms, and required the exact same treatment.

Documentation in the medical record must be specific to the patient and their situation at the time of the encounter.

Providers are responsible for performing the documented services within the medical record. Patient-specific information cannot be copied from another provider's entry without accrediting the original author.

### **Illegible Medical Records**

All entries in the medical record must be legible to another reader so that a meaningful review may be conducted.

Legibility of medical records is not just a billing or compliance issue; it is a patient care issue. Illegible documentation may result in medication errors and incorrect diagnoses and procedures being assigned to the patient.

It is especially critical that the identity of the provider of the service be legible.

### **Documentation Criteria**

The patient's medical record must contain documentation that supports services rendered. Documentation should include, but is not limited to, relevant history, physical examination, diagnostic test(s) and/or procedure results, and a diagnosis consistent with those findings and/or test results.

### **Billing**

Services submitted on claim forms and itemized statements must be reflected and supported in the medical documentation. Failure to provide supporting documentation may result in processing delays or denial of services.

Additional documentation requirements may exist in other plan documents.

## References

Centers for Medicare and Medicaid Services Medicare Learning Network, MLN Fact Sheet, Complying with Medical Record Documentation Requirements. Pages 1 -3 through Insufficient Documentation Errors. Accessed 11/05/2024.

<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/CERTMedRecDoc-FactSheet-ICN909160.pdf>

## Policy Update History

Approval Date	Description
11/28/2018	New policy
10/17/2019	Annual Review
02/06/2020	Policy name revision from CPCPG001, Disclaimer update
03/31/2021	Annual Review
09/22/2021	Updated verbiage
09/16/2022	Annual Review
10/30/2023	Annual Review
11/05/2024	Annual Review