
SOUTHWEST MICHIGAN BEHAVIORAL HEALTH

TO: REGIONAL COMPLIANCE COMMITTEE; CLS/PERSONAL CARE PROVIDERS
FROM: MILA C. TODD
SUBJECT: SIGNATURE DATE REQUIREMENTS
DATE: JUNE 25, 2020

The purpose of this memo is to clarify the signature date requirements for CLS and Personal Care codes (H2016, H2015, H0043, T1020).

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 of service, and prior to the submission of the claim or encounter.

The expectation for providers of CLS and Personal Care services and signature dates are as follows:

- H2015: Each individual date of service must be signed by the service provider and the signature must be dated prior to the date of the claim submission. The lack of a signature and/or signature date will result in a recoupment for the date of service being reviewed. If the signature date is after the date the claim was submitted, a recoupment will be required.
- H2016/T1020: If providers already have documentation formatted for individual date of service signature dates, that is acceptable. Otherwise, there must be a signature and signature date covering the entire month of documentation from a home manager/supervisor and the signature must be dated within 7 days of the last day of the month being reviewed. Service documentation that does not include a signature and signature date will result in a recoupment for the date of service being reviewed. If the signature date is after the date the claim was submitted, a recoupment will be required.
- H0043: If providers already have documentation formatted for individual date of service signature dates, that is acceptable. Otherwise, there must be a signature and signature date covering the entire month of documentation from a home manager/supervisor and the signature must be dated within 7 days of the last day of the month being reviewed. Service documentation that does not include a signature and signature date will result in a recoupment for the date of service being reviewed. If the signature date is after the date the claim was submitted, a recoupment will be required.
 - We recognize that, beginning October 1, 2020, H0043 will no longer be in use and these services will be reported using H2015. We will offer additional guidance at that time.

Please ensure that all providers are aware of this expectation moving forward. Any questions or concerns can be relayed to the SWMBH Program Integrity/Compliance Department.