

The following question was raised at the NYHIMA Medicolegal Issues seminar in New York City on November 30, 2007. The explanation provided here is from Alison Nicklas, RHIA CCS, one of the presenters:

*“Where can one find information from CMS stating that all entries in the medical record must be signed, dated and timed, by all disciplines? Does the same rule apply to the Care Plans regarding time?”*

The Physician Documentation section of the Medicare Conditions of Participation states that all documented entries must be signed, dated, and timed. In addition, the Medical Record section states that ALL entries must be signed, dated, and timed.

The November 27, 2006, ***Federal Register*** contains the updated Medicare and Medicaid Programs; Hospital Conditions of Participation; Final Rule. There you will find the following information:

1. Page 68674 states that “All orders, including verbal orders, must be dated, timed, and authenticated promptly by the prescribing practitioner.” and
2. Page 68675 states that “Authentication includes dating and timing of a medical record entry.”

Additional information is available in articles at:

<http://www.bricker.com/publications/articles/1011.pdf>, which states, “**The time must** now be noted in all patient medical record entries, in addition to the requirements that the entry be legible, complete, dated and authenticated in written or electronic form by the person responsible for providing or evaluating the service provided, consistent with hospital policies and procedures.”, and at: [http://www.phelpsdunbar.com/uploads/media/HLU121106\\_01.htm](http://www.phelpsdunbar.com/uploads/media/HLU121106_01.htm), which notes, “Finally, the regulations specify that all medical record entries must be timed, in addition to being dated and authenticated. According to CMS, ‘medical record entries’ include orders, progress notes, procedure notes, patient assessments, H&Ps, etc. It should be noted that TAG A-0210 of the Guidelines requires all medical record entries to be timed, even though timed entries are not required by the current regulations in effect until January 26, 2007.”

A helpful resource, ***CMS Conditions of Participation FAQs: A Guide to Restraints, H&Ps, Verbal Orders, Medication Security, and Postanesthesia Evaluations***, is available from HCPro’s healthcare marketplace online store for \$49 at: <http://www.hcmarketplace.com/prod-5200.html>.