Prior Authorization Process Streamlined: E-Signatures Now Accepted on TMHP Fillable Forms

Information posted April 1, 2016

In response to provider feedback, TMHP has improved the prior authorization submission process with new, time-saving features.

Beginning April 1, 2016, Texas Medicaid and Children with Special Health Care Needs (CSHCN) Services Program providers can submit requests by completing the authorization or prior authorization request using the fillable PDF available for download on the new TMHP Prior Authorization web page and using electronic signatures (e-signatures) for all necessary signatures.

These changes will apply for all authorizations and prior authorizations submitted to TMHP for consideration.

E-Signatures Accepted

TMHP will now accept e-signatures on all prior authorization requests and supporting documentation submitted to TMHP. Electronic signatures will be accepted by mail or fax beginning April 1, 2016, or through the TMHP Prior Authorization on the Portal (PA on the Portal) beginning June 6, 2016.

Providers must choose software with electronic signature technology that meets all applicable statues and requirements as outlined in the Texas Medicaid Provider Procedures Manual and the CSHCN Services Program Provider Manual. Examples of e-signature software include, but are not limited to:

- RightSignature™
- Adobe® eSign
- Electronic health record software

Important: TMHP does not endorse any particular e-signature software. Providers should research the available software that provides e-signature ability and choose the software that meets all applicable statues and rules specific to the provider’s type and requirements as outlined in the Texas Medicaid Provider Procedures Manual and the CSHCN Services Program Provider Manual, and that best suits the providers’ needs.

Electronic signatures for the following providers and clients will be accepted:

- Prescribing, ordering, or requesting providers
- Dispensing providers
- Clients, and responsible adults allowed to electronically sign prior authorization forms and supporting documentation

Fill out All Authorization and Prior Authorization Forms Using the Fillable PDFs and Sign Electronically

Providers now have the ability to fill out and e-sign all Texas Medicaid prior authorization and CSHCN Services Program authorization and prior authorization forms online using
the fillable forms that are available for download on the TMHP Prior Authorization website.

To e-sign documents, the provider must attest that the electronic signature included in the request is true and correct to the best of his or her knowledge. To fulfill this attestation requirement, TMHP has updated all prior authorization and authorization forms to include a submitter certification statement. The requestor must provide his or her agreement to the following statement for the prior authorization to be valid and for the e-signature to be accepted by TMHP:

Providers who submit authorization or prior authorization requests with e-signatures must attest that the e-signatures included in the requests are true and correct to the best
of their knowledge by checking “We Agree.” Prior authorization forms that do not contain this certification statement cannot be submitted with an e-signature on or after April 1, 2016.

The following deadlines apply for new forms effective on or after April 1, 2016, and old forms effective on or before March 31, 2016:

<table>
<thead>
<tr>
<th>Form</th>
<th>Signature Type</th>
<th>Accepted</th>
</tr>
</thead>
<tbody>
<tr>
<td>NEW: TMHP fillable form (with certification statement)</td>
<td>Handwritten/wet signature* (*See Note1 and Note2)</td>
<td>On or after April 1, 2016</td>
</tr>
<tr>
<td>NEW: TMHP fillable form (with certification statement)</td>
<td>e-signature</td>
<td>On or after April 1, 2016</td>
</tr>
<tr>
<td>OLD: TMHP non-fillable form (no certification statement)</td>
<td>Handwritten/wet signature*</td>
<td>Accepted through 11:59pm June 5, 2016</td>
</tr>
<tr>
<td>OLD: TMHP non-fillable form (no certification statement)</td>
<td>e-signature</td>
<td>Not accepted</td>
</tr>
</tbody>
</table>

* Note1: All fax transmissions must reflect the date, time, and fax number of origination, and the original document must be maintained by the provider.

* Note2: All documentation submitted with a handwritten provider's signature must have a handwritten date next to the signature and must be kept in the client's medical record. (“Handwritten” signatures include those that are written using an ink pen on a paper form. Signatures written with a stylus on an electronic document are considered e-signatures, not handwritten signatures.)

Reminder: Providers are allowed to recreate a Texas Medicaid or CSHCN Services Program prior authorization or authorization form for the purpose of making the form fillable only if there are no alterations in the form’s content or placement of information (field location). The provider-created form must exactly match the TMHP-created form. The same deadline and rules apply for provider-created forms as those applied to TMHP forms available on the TMHP website.

To ensure that the most current version of the form is used, all forms submitted to the prior authorization department for processing must include the form number, effective date and revision date, if applicable, as it appears on the original TMHP form that is published on the TMHP Forms web page. The form number, effective date and revision date, if applicable, must appear on each page of the authorization or prior authorization form including the page that contains the submitter certification statement.

Any signature (electronic or handwritten) on a submitted document certifies, to the best of the provider’s knowledge, that the information in the document is true, accurate, and complete.

**Types of E-Signatures Accepted**

Texas Medicaid and the CSHCN Services Program define “electronic signature” in accordance with the Uniform Electronic Transactions Act (UETA) definition as “an
electronic sound, symbol, or process, attached to or logically associated with a contract or other record and executed or adopted by a person with the intent to sign the record."

TMHP will accept e-signatures derived by software that allows the provider to:

- Sign the image of the document using their finger or a stylus. The signature is a digital image of the provider’s actual signature, and must contain a date and time stamp.
- Create the signature accompanied by a digital signature logo with a system-generated date and time stamp or with the logo of the digital software used. The signature is a digital image in a font appointed by the software.

**Note:** Electronically-signed documents must have an electronic date on the same page as the signature. Electronic signatures that are generated through an electronic medical record (EMR) or electronic health record (EHR) system that complies with applicable federal and state statutes and rules are acceptable.

The following e-signatures are examples of acceptable submissions:

**Example 1:** Software which provides a date stamp, time stamp, and product logo

![Example 1 Image]

**Example 2:** Software which provides an electronic signature certificate on a separate page (not added to the prior authorization form itself)
Example 3: Valid signature with date and time stamp

Example 4: Valid signature with date and time stamp and software logo
What's Not an E-Signature?

The following types of signatures will not be accepted:

- Inked stamped signatures
- Images of wet signatures (i.e., photocopies of handwritten signatures)
- Typed signatures without a digital time stamp or software logo will not be accepted
- Digitized signatures will not be accepted. (Examples include scanned images of handwritten signatures or signatures on a signature pad. Handwritten signatures on faxed documents are not digitized signatures.)

The following submissions are examples of invalid e-signatures:

Example 1: Typed signatures without a digital time stamp or software logo

<table>
<thead>
<tr>
<th>Provider Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provider printed name: John Smith</td>
</tr>
</tbody>
</table>

John Smith

Provider Signature (stamped signatures not accepted)

Example 2: Images of wet signatures (i.e., photocopies of handwritten signatures)

<table>
<thead>
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</tr>
</thead>
<tbody>
<tr>
<td>Provider printed name: John Smith</td>
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</tbody>
</table>

Provider Signature (stamped signatures not accepted)

Example 3: Invalid signature with no time stamp or software logo
Obtaining Multiple E-Signatures

Prior authorization forms that require multiple signatures, such as the Home Health Services (Title XIX) DME/Medical Supplies Physician Order Form, can be emailed or faxed to a second signee to obtain an additional e-signature as happens today. The prescribing provider can now e-sign the document and email or fax the e-signed document back to the dispensing provider as long as the prescribing provider uses software that creates electronic signatures.

The dispensing provider that submits the prior authorization request to TMHP must attest that all e-signatures on the form are valid and meet the requirements of an e-signature by clicking “We Agree” to the submitter certification statement.

Refer to: The article titled, “E-signatures and the Home Health Services (Title XIX) DME/Medical Supplies Physician Order Form” which was published on this website on April 1, 2016, for more information about e-signatures and the Home Health Services (Title XIX) DME/Medical Supplies Physician Order Form.

Maintaining Complete Documentation

To maintain accurate client and provider documentation, all electronically-signed transactions and electronically-signed documents must be kept in the client’s medical record.

Prescribing and dispensing providers that use e-signatures must provide a certification that the electronic signature technology that they use complies with all applicable federal and state statutes and administrative rules.

A hard copy of electronic transactions and signed documents must be available upon request.

Note: This article applies to prior authorizations and authorizations submitted to TMHP for processing. For prior authorizations and authorizations processed by a Medicaid managed care organization (MCO), providers must refer to the MCO for information about benefits, limitations, prior authorization, and reimbursement.

For more information, call the TMHP Contact Center at 1-800-925-9126.