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MEMORANDUM (DMS-14)

To: Medicaid Providers
From: Division of Medical Services (DMS)
Date: April 2, 2020
Re: E-Signatures at Pharmacies

Revised May 26, 2020:

This guidance ends at the expiration of the public health emergency as declared by the Governor of Arkansas.

In response to the COVID-19 outbreak in Arkansas and consistent with CMS guidance, DMS Pharmacy is allowing the relaxation of the signature requirements found in Sections 206.000 & 221.100 of the Pharmacy Provider Manual.

This suspension is consistent with the CMS guidance issued on March 20, 2020, which states

[R]equiring a patient signature for receipt of medication could undermine current public health efforts to combat the spread of the coronavirus. We are making clear that HHS does not require and will not audit for patient signatures as proof of delivery for any medications, including for controlled substances for Part D beneficiaries.

To allow for appropriate auditing, DMS recommends using a notation such as COVID-19 or C-19 as proof of delivery for medications in lieu of a signature.

To ensure quality and consistency of care to Medicaid beneficiaries, DMS will coordinate with the Office of the Medicaid Inspector General (OMIG) to conduct retrospective reviews and audits of these services during this time. Please keep all records of services as required by Medicaid physician billing and telemedicine rules.