



COVID-19 FAQ

22. Providers are refusing to sign our PCS forms due to risk of COVID exposure with paper. What are our options?

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Answer:

Consider electronic options

If a provider refuses to sign paper PCS forms you can request the provider sign an electronic version of the PCS form. CMS has emphasized that no specific format is required for PCS forms and that the form does not need to be a stand-alone document. Your paper PCS form can easily be converted into an electronic file, such as a fillable PDF, or integrated into your electronic PCR program. Such electronic PCS forms can also be imported into hospital and physician software to facilitate completion by the providers and be exported electronically or by e-mail to the ambulance service. Keep in mind that paper PCS forms can be completed in the physician's office and then faxed to the ambulance service, eliminating any concern of possible contamination. Remember, faxing is expressly permitted under HIPAA.

21-day rule (for unscheduled or scheduled, but non-repetitive transports)

If a provider refuses to sign a paper (or electronic) PCS form and the transport does not involve a scheduled repetitive transport (which must be obtained in advance of the transport), you can rely on the 21-day rule to bill CMS for unscheduled and nonrepetitive non-emergency transports. If you are unable to obtain the required certification within 21 calendar days following the date of the service, you must document your attempts to obtain the requested certification and may then submit the claim. Acceptable documentation includes a signed return receipt from the U.S. Postal Service or another similar service that evidences that you attempted to obtain the required signature from the patient's attending physician or another authorized individual. Remember, this 21-day rule only applies to unscheduled and nonrepetitive non-emergency transports.

Document the Inability to Obtain a PCS Form

CMS has stated that for transports performed during the COVID-19 PHE (January 27, 2020 until expiration), it will not review an ambulance service's compliance with appropriate PCS signature requirements for non-emergency ambulance signature requirements during medical review absent an indication of fraud or abuse. Please see our article on the guidance from CMS [here](#). If your ambulance service cannot obtain a PCS due to the COVID-19 pandemic, we recommend documenting this fact in one – or more – of the following ways:

- *Dispatch Documentation.* Since PCS forms in some agencies are obtained by dispatch or call intake staff, sometimes via fax or e-mail, and not at the time of transport, the dispatcher could make a note that a signed PCS could not be obtained despite making efforts to do so. The CMS guidance does not indicate that the inability to obtain a PCS is something that *must* be documented on a PCS itself, or on a patient care report, and nothing indicates that the transport crew must sign any statement or attestation to that effect. So, we believe that documentation from your dispatch or call intake personnel who normally fulfill the role of obtaining the PCS for your organization would satisfy the CMS guidance.
- *PCR Documentation.* The crew handling the non-emergency transport could also document those instances where no PCS was available on the ambulance patient care report (PCR). This would also appear to meet the CMS guidance. A statement such as “no PCS form could be obtained at the time of service” or words to that effect would help meet that purpose.
- *PCS Forms.* If an ambulance service wishes, it could use a PCS form for this purpose as well. The ambulance service could indicate the patient’s name and transport date on the PCS, and then could simply document that “no authorized PCS signer was available or willing to sign” or words to that effect. We do not recommend that the ambulance service or any members of the ambulance crew fill out any of the clinical or medical necessity-related information on the PCS – only the patient’s name and transport date should be completed if a PCS is going to be used for this purpose.

Click [here](#) to download a copy of PWW’s Sample Medical Necessity Certification Statement for Non-Emergency Ambulance Services.