

**Bulletin Number:** HASA 22-13

**Distribution:** All Providers

**Issued:** May 2, 2022

**Subject:** Signature Log and Proof of Delivery Requirements

**Effective:** As Indicated

**Programs Affected:** Medicaid, Healthy Michigan Plan, Children's Special Health Care Services (CSHCS), Maternity Outpatient Medical Services (MOMS)

The purpose of this policy is to identify the pharmacy signature log requirements declared as waived in numbered letter [L 20-20](#). Waiving these requirements was determined necessary in response to the COVID-19 public health emergency (PHE) and shall remain waived until further notice in accordance with Bulletin [MSA 20-36](#).

Numbered letter [L 21-31](#) was issued on April 28, 2021, and, like numbered letter L 20-20, addressed signature log requirements for proof of delivered medications. The signature log requirements declared waived in numbered letter L 20-20 have remained in effect since March 26, 2020. Accordingly, while numbered letter L 21-31 was issued on April 28, 2021, it has not taken effect while numbered letter L 20-20 has remained in effect. Even though numbered letter L 21-31 has not taken effect, it is now rescinded.

Effective upon the prospective termination of the COVID-19 pharmacy flexibilities permitted by numbered letter L 20-20, the following signature log and proof of delivery requirements will be identified in the [Michigan Department of Health and Human Services \(MDHHS\) Medicaid Provider Manual](#).

These requirements will apply to prescriptions received both at pharmacy retail locations and delivered to the Medicaid beneficiary's place of residence.

Pharmacy providers must document receipt or delivery of new or refilled medications to the intended Medicaid beneficiary. This documentation serves as verification of the beneficiary receiving the prescription billed. The absence of the appropriate verification indicates the beneficiary did not receive the prescription, and funds will be recouped from the pharmacy. Documentation described below must be retained for review by MDHHS or the MDHHS agent for seven years and is subject to audit. Any method of reproducing past signatures is not acceptable.

### **Signature Log (for Prescriptions Picked Up at the Pharmacy)**

Pharmacy providers must maintain a log containing the following information:

- Beneficiary's name;
- The manual or electronic signature of the beneficiary or their representative; and
- The date of receipt of the prescription.

### **Proof of Delivery (for prescriptions delivered)**

For prescriptions delivered by common carrier (U.S. mail, FedEx, UPS, etc.), a tracking number alone is not considered a valid proof of Member receipt. The tracking number must be accompanied by either:

- The manual or electronic signature of the beneficiary or their representative at the time of delivery; or
- The tracking detail from the common carrier showing the specific prescription was delivered, including date and time of delivery.

Documentation must be stored in accordance with the General Information for Providers chapter of the MDHHS Medicaid Provider Manual, State Law subsection. Adherence to these requirements must be readily available on-site and may be subject to audit by MDHHS.

### **Manual Maintenance**

Retain this bulletin until the information is incorporated into the MDHHS Medicaid Provider Manual.

### **Questions**

Any questions regarding this bulletin should be directed to Provider Inquiry, Department of Health and Human Services, P.O. Box 30731, Lansing, Michigan 48909-8231, or e-mailed to [ProviderSupport@michigan.gov](mailto:ProviderSupport@michigan.gov). When you submit an e-mail, be sure to include your name, affiliation, NPI number, and phone number so you may be contacted if necessary. Typical Providers may phone toll-free 1-800-292-2550. Atypical Providers may phone toll-free 1-800-979-4662.

An electronic copy of this document is available at [www.michigan.gov/medicaidproviders](http://www.michigan.gov/medicaidproviders) >> Policy, Letters & Forms.

### **Approved**



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