

**Title: Signatures for Diagnostic Laboratory Test Requisitions  
Creates Inefficiency, Increased Costs and Patient Safety  
Risks**

**Introduced by: Mark Tuthill, MD, for the Wayne County Delegation**

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**Referred to: Reference Committee A**

**House Action:**

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**Whereas, the Center for Medicare and Medicaid Services (CMS) has issued regulations (65 FR 13082), that the physician or qualified non-physician practitioner (NPP) (that is, clinical nurse specialists, clinical psychologists, clinical social workers, nurse-midwives, nurse practitioners (NPs), and physician assistants (PAs)) who order the laboratory service must maintain documentation of medical necessity in the beneficiary’s medical record, and**

**Whereas, the regulations require a physician’s or NPP’s signature on requisitions for clinical diagnostic laboratory tests paid under the Clinical Laboratory Fee Schedule (CLFS), and**

**Whereas, this policy does not affect physicians or NPPs who choose not to use requisitions to request clinical diagnostic laboratory tests paid under the CLFS, and**

**Whereas, this requirement may lead physicians to choose ordering practices for which a requisition is not required creating confusion, inefficiency, omission of important clinical information, and**

**Whereas, laboratory testing for physicians is already highly regulated requiring physicians to be licensed (in many states), credentialed and validated in laboratory information systems for appropriate patient billing and reporting of results, and**

**Whereas, a signature is redundant and retards the efficiency of laboratory testing workflow, and**

43           **Whereas, the CMS initially delayed enforcement of the physician**  
44 **signature requirement for three months and finally rescinded the requirement**  
45 **all together; therefore be it**

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47           **RESOLVED: That the MSMS work with the AMA and other member**  
48 **medical sub-specialty societies, including the College of American Pathologists**  
49 **(CAP), American College of Physicians (ACP), American Academy of Family**  
50 **Physicians (AAFP), American Society for Clinical Pathology (ASCP), and**  
51 **American Clinical Laboratory Association (ACLA), to maintain awareness of**  
52 **the proposed requirement for signatures for diagnostic laboratory test**  
53 **requisitions and its implications, as it may arise again in the future; and be it**  
54 **further**

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56           **RESOLVED: That the MSMS and the AMA state their support for the**  
57 **decision by CMS to retract regulations requiring signatures for diagnostic**  
58 **laboratory test requisitions, as being beneficial for patients and physicians.**

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61 **WAYS AND MEANS COMMITTEE FISCAL NOTE: NONE**