



2600 Bull Street  
Columbia, SC 29201-1708

February 8, 1999

## MEMORANDUM

TO: Hospital Administrators

FROM: Jerry L. Paul, Director  
Health Licensing Section

SUBJECT: Provider-Wide Exception Dated December 21, 1994, Regarding Authentication of Verbal Orders by Prescribers

Regulation 61-16, Standards for Licensing Hospitals and Institutional General Infirmaries, Section 601.6, requires: "All medical records shall contain the orders for medication and treatment written in ink and signed by the prescriber or his designee. All orders, including verbal orders, shall be properly recorded in the medical record and dated and signed by the prescriber or designee within 48 hours."

On December 21, 1994, our Section issued a provider-wide exception (PWE) which established an alternative to the requirement that verbal orders be signed by the prescriber within 48 hours. Please review the enclosed copy of the PWE for details related to this exception.

Recent clarification from the Region IV Health Care Financing Administration of the US Department of Health & Human Services indicates that hospitals implementing the December 21, 1994, PWE are out of compliance with The Medicare Conditions of Participation for Hospitals. **Thus, if your hospital participates in the Title XVIII or Title XIX reimbursement programs you do not have the option of adopting the PWE.** If your hospital does not participate in the Title XVIII or Title XIX reimbursement programs you may adopt, or continue implementation of, the PWE.

During licensing inspections Section staff will review facility policies and procedures to determine whether your hospital has adopted the PWE or not, and will enforce during inspections, your adherence to the standards of R61-16, Section 601.6 or the PWE, as per your policies and procedures.

If there are any questions, please call Dennis Gibbs at (803) 737-7370.

JLP:DG:dg

Enclosure

cc: Doug Bryant, Commissioner  
Alice Truluck, DHEC  
Trudy Solomon, SCHA

Karen Price, DHEC  
Karen Reeves, SCHA