

Electronic Signatures in New York



Figure: Help & Support Reference Docs Page

In her memo of 12/21/2009, Sheila McBain, OPWDD Deputy Commissioner, Division of Quality Management, issued OPWDD's Policy Statement on Electronic Records which confirmed OMIG's stance stated in a memo dated 11/1/2005 and also available from Therap.

The policy states: "The Office for People With Developmental Disabilities (OPWDD) accepts the use of electronic signatures and electronic records for all OPWDD documents except where a



Figure: OPWDD Memo

written signature or document is expressly required by law and in a manner fully consistent with the attached audit directive number 21 from the NYS Department of Health dated November 1, 2005."

To be compliant, the agency must be able to authenticate that the document was produced by the author at the time stated and "The electronic medical record must have a control feature which date stamps each entry into the record that cannot be turned off or over-written."

This is a vital point when considering the type of system you want to use. If your database is hosted on your own computers where your staff have direct access to it, or it is hosted by a company that will make undocumented changes to the data, then, all of your electronic documentation could be invalidated.

Therap has been designed from the ground up as a web-based system with full authentication and audit trails so that there is no need to print paper at every stage (except where required by regulation).

Therap is in ongoing discussions with New York agencies, provider groups, and OPWDD to ensure that its electronic signatures meet and continue to meet the standards required by OPWDD, OMIG, and CMS.

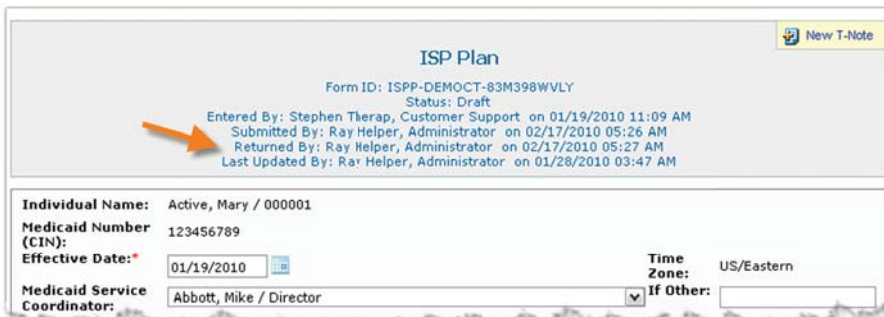


Figure: ISP Plan

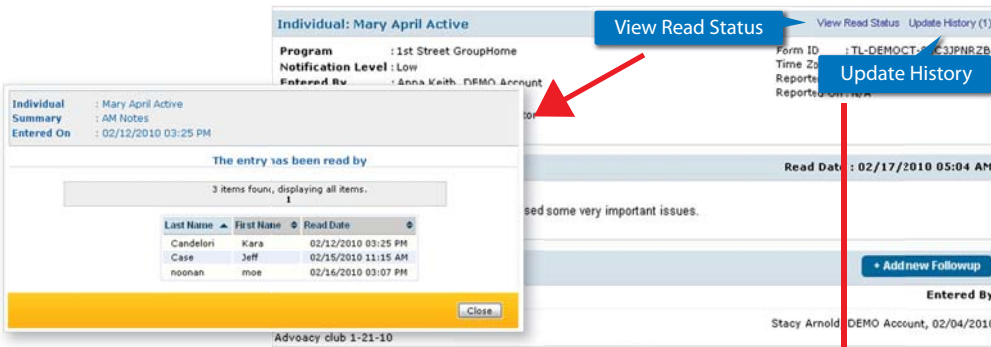


Figure: View Read Status

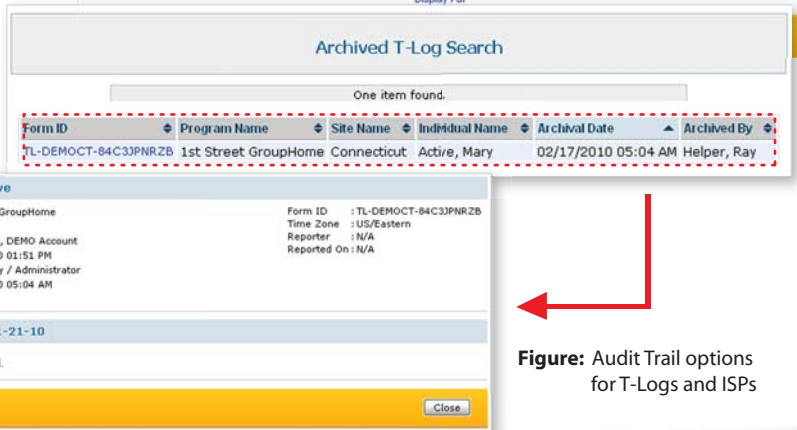


Figure: Audit Trail options for T-Logs and ISPs