



## INFORMATION NOTICE 19-08


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**Date** November 22, 2019

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**To** Department of Behavioral Health (DBH) Contract and Fee-for-Service (FFS) Providers

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**From** Veronica Kelley, DSW, LCSW, Director 

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**Subject** Consolidation of Electronic Signature (E-Signature) List of Providers and Provider Signature Log

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**Purpose** The purpose of this DBH Information Notice (IN) is to communicate combining of DBH Electronic Signature List of Providers and Provider Signature Log, to ensure all Contract and FFS providers begin using the revised format. The revised format shall collect direct service providers whom are approved to record rendered services in the agency's Electronic Health Record (EHR), **and** document direct service provider signatures for reference during Quality Management (QM) audits.

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**Background** Pursuant to DHCS (formerly DMH) Letter 08-10, ADP 08-13 and ADP 10-01, an Electronic Signature Agreement establishes the appropriate terms and practices between counties and contracted providers in the design, implementation and use of electronic signatures (e-signatures) capabilities.

DBH QM performs chart and site review audits to ensure Contract/FFS Providers are compliant with general State, Medi-Cal and Medicare documentation standards, which require treatment services to be recorded in the medical record and be signed by the direct service provider rendering said recorded service(s). In an effort to assure appropriate practices, QM requires Provider Signature Logs as a method to verify the authenticity of service provider signatures.

This IN 19-08 combines both the List and Log in an effort to maintain efficiency. It requires that all Contract and FFS Providers complete a new form to list all direct service providers. Completion of the revised format will satisfy requirements for agencies whom maintain an approved E-Signature Agreement **and** for agencies that still record services in paper charts.

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### Consolidation of the List/Log

Effective immediately, DBH requires that all Contract and FFS Providers use the new **E-Signature and Provider Signature List** form, to record all direct service providers.

All of the following information must be included for each direct service provider with their **original-wet** signature certifying the information listed is true and accurate:

- First and Last Name;
- Discipline;
- License/Certification Number;
- Provider NPI;
- Date individual was added to list;
- Signature of direct service provider.

**Note:** The List(s) will be available and accessible to DBH QM to ensure appropriate reference when QM audits are being completed.

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### Submitting the List/Log

The **E-Signature and Provider List** shall be submitted to DBH Compliance at [Compliance\\_Questions@dbh.sbcounty.gov](mailto:Compliance_Questions@dbh.sbcounty.gov) when there is a change in provider information, contract signing and annually thereafter.

The below table provides more information for when the E-Signature and Provider List is required:

If...	Then...
A new employee has been hired and they have been approved to render and record services as a direct service provider.	Individual listed only. However, If there are multiple new hires, then the form should list all new hires.
The name of a direct service provider changes.	Individual listed only.
Contract signing	Comprehensive list of all direct service providers.
Annually	Comprehensive list of all direct service providers.

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### References

- CA Code of Regulations, Title 9, Section 1810.440 Quality Management Programs
  - Department of Health Care Services, [ADP Bulletin, Issue No.: 08-13](#) Electronic Signatures in Electronic Health Record Systems Used by Counties and providers
  - Department of Health Care Services, [ADP Bulletin, Issue No.: 10-01](#) Electronic Signatures in Electronic Health Record Systems Used by Counties and Providers
  - Department of Health Care Services, [DMH Letter No.: 08-10](#) Electronic Signatures and Electronically Signed Records
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### Related Policy or Procedure

- Department of Behavioral Health, [IIN 10-003](#) Use of Electronic Signatures
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### Questions

For questions regarding this Information Notice, please contact the DBH Office of Compliance at (909)388-0879 or via email at [compliance\\_questions@dbh.sbcounty.gov](mailto:compliance_questions@dbh.sbcounty.gov).

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