

Louisiana Department of Health Office of Aging and Adult Services

MEMORANDUM OAAS-SC-25-001

TO: OAAS Support Coordination Agencies (SCAs)

FROM: Gearry Williams, OAAS Assistant Secretary Meony Williams

DATE: January 7, 2025

SUBJECT: OAAS Electronic Signature Policy for SCAs

The memorandum is being sent to Support Coordination Agencies (SCAs) to inform you that your agency may begin obtaining electronic signatures effective today, January 7, 2025.

The attached OAAS Electronic Signature Policy for SCAs (OAAS-ADM-25-001) policy provides details regarding electronic signatures and this information will be added to applicable LDH/OAAS manuals (Medicaid CCW manual, Medicaid ADHC Waiver manual and/or OAAS Procedures Manual for ROs and SCAs).

It is important for SCAs to use an electronic signature platform that meets the LDH HIPAA requirements and OTS Security requirements.

- LDH HIPAA Link: https://ldh.la.gov/page/hipaa
- OTS Information Security Policy: Information Security Louisiana Division of Administration (la.gov)

If you have any questions regarding the information above or the Electronic Signature policy, please contact Cheryl.Dickerson@LA.gov.

C: OAAS Regional Offices
Medicaid Program Support and Waivers (MPSW)

Attachment: OAAS Electronic Signature Policy for SCAs, OAAS-ADM-25-001



Electronic Signature Policy for Support Coordination Agencies

When the Office of Aging and Adult Services (OAAS) Support Coordination Agencies (SCAs) are obtaining signatures from OAAS waiver participants, they may use one of the following types of signatures:

- Wet signatures; or
- Electronic signatures.

For purposes of this policy, "participant" refers to OAAS waiver applicants, participants and/or responsible representatives.

When obtaining electronic signatures, the **SCA MUST**:

- Adhere to the State of Louisiana Division of Administration Office of Technology Services Information Security Policy Information Security Louisiana Division of Administration (la.gov).
- Use an electronic signature platform that meets:
 - LDH HIPAA requirements https://ldh.la.gov/page/hipaa; and
 - o DOA OTS Security requirements (per OTS Information Security Policy).
- Have a Business Associate Agreement (BAA) between the SCA and the electronic signature platform provider.

For electronic signatures, the participant **MUST**:

- Agree to use the electronic signature option.
 - NOTE: If at any time, a participant states that they want to sign ANY documents with a wet signature and NOT an electronic signature, the SCA must accommodate this request.
- Be capable of using the electronic signature option.

SCAs must ensure the following:

- Authenticity of the signature;
 - Electronic signature platform must capture the IP address;
 - If face-to-face, ensure that the participant is actually signing the document via electronic format;
- That any Protected Health Information (PHI) contained within the document is protected from unauthorized access and disclosure; and
- The document is protected after it is signed electronically.

Issued January 2, 2025 OAAS-ADM-25-001