
OMHSAS Encounter Forms/Client Signature Suspension

As part of the *OMHSAS – COVID-19 Public Health Emergency Suspended Regulations List* published on August 14, the noted regulatory suspensions are valid from March 6, 2020 and will remain in place while the Disaster Proclamation related to COVID-19 or such other time as the Department of Human Services (DHS) Office of Mental Health and Substance Abuse Services (OMHSAS) directs. Within the regulatory suspensions is guidance confirming that encounter forms for client service including telehealth sessions are not required except for treatment/service plans. See language below for specifics:

Limited Suspension: The requirements for signatures by consumers and case managers in case notes, encounter forms and service plans are suspended although providers are strongly encouraged to obtain them electronically when possible. Verbal consent must however be documented and signatures for service plans must be obtained within 60 days of the end of the disaster emergency declaration period.

While this guidance is not listed in every relevant DHS Regulatory Chapter references within the Public Health Emergency (PHE) memorandum and chart, we have confirmed with OMHSAS Policy that the suspension of signatures pertains to client encounters across OMHSAS licensed services. An overview of the PHE Regulatory Suspensions memorandum and regulatory suspension chart can be found below:

- A [memorandum](#) summarizing the regulatory suspensions
- A [chart](#) with a detailed list of the regulatory provisions suspended

If you have any questions, please contact your RCPA Policy Director.