

## **ORMED Medicaid Billing Electronic Signature Policy** **Revision 0.0.4, updated 9/30/2020**

Many Special Education programs in Oregon use the ORMED electronic record keeping system to manage student records. The data system allows specific service providers to enter Medicaid billing records, and to electronically authorize them for submission to the Oregon Health Authority (OHA) for payment processing. This document outlines a policy for managing electronic authorization of Medicaid billing records by service providers. Electronic authorization is synonymous with electronic signature.

### **Background**

The purpose of a provider specifically authorizing a Medicaid billing record is two-fold; first to affirm the accuracy of the content, and second to positively state intent to process the record for billing. ORMED employs a combination of encryption, account privileges and program logic to prevent signatures from being forged and signed record content from being changed. Programmers, however, have greater system privileges and could subvert the controls. Some data systems address this by encrypting content with a key unique to the service provider, then outsourcing the management of that key to an organizationally separate agency. This makes intentional and unintentional fraud more difficult, as organizationally independent individuals must collude to get the key to decrypt, change and then re-encrypt the data. Neither ORMED, nor companion systems such as EC-Web that handle data transfer to OHA, support outsourced key management.

To address this vulnerability and other broader security responsibilities, this policy includes agreements to be signed by individuals in key roles specifying appropriate use and acknowledging accountability.

### **Oregon Administrative Rules**

The "Oregon Administrative Rules Compilation" (OAR) is the official compilation of rules and regulations having the force of law in the state of Oregon. One rule applies to the use of electronic authorization in the context of this policy: OAR 125-600-0005 Guidelines for Use of Electronic Signatures by State Agencies. This rule implements the electronic signature provisions of the federal Uniform Electronic Signatures Act (UETA). It directs agencies to use tools provided by the National Institute of Standards and Technology (NIST) to determine the level of assurance the agency needs that the party signing an electronic transaction is authentic, and to apply recommended technology to mitigate risks.

Accordingly, electronic authorization in ORMED was evaluated using the GSA E-Authentication Risk and Requirements Assessment Tool and the NIST Information Technology Laboratory (ITL) Security Bulletin 'Guidance For Selecting Secure Techniques'. The ORMED application employs the security techniques recommended in the evaluation.

Though not specifically required by OARs, the ORMED application also includes many additional security controls specifically for Medicaid billing records. For instance, records

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(including provider authorization) are locked when batched for submission to OHA, and a duplicate copy is saved for audit support.

### **Policy**

Account holders and managers in ORMED, programmers and programmer supervisors must agree to specific security practices regarding Medicaid billing access and records. These are standard security practices and are consistent with normal job expectations; they are made explicit in a signed agreement to reinforce their importance, preclude exceptions and emphasize accountability.

Specifically:

Medicaid billing providers

- must keep their account password private, and not allow others access to ORMED under their username and password.

Data administrators

- must grant only appropriate access to Medicaid billing features, and limit access to those who require it for billing, billing administration or supervision only.
- must not assist anyone to login to an account with access to Medicaid billing features, where that person is not the owner of that account.
- must keep their own account password private, and not allow others access to ORMED under their username and password.

System programmers

- must not change the content of Medicaid billing records to mean something other than was authorized by the service provider.
- must not subvert any security control to allow another to change the content of Medicaid billing records to mean something other than was authorized by the service provider.

Supervisors of programmers

- must not ask anyone to change the content of Medicaid billing records to mean something other than was authorized.
- must not ask anyone to subvert any security control to allow another to change the content of Medicaid billing records to mean something other than was authorized.

### **Agreement forms**

The following page is the agreement form for this policy.

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**ORMED Medicaid Billing Provider Agreement**

This form is required by ORMED Medicaid Billing Electronic Signature Policy. It need only be completed once by the Provider to indicate understanding, and is to be retained in your agency personnel files.

Many Special Education programs in Oregon use the ORMED electronic recordkeeping system to manage student records. The data system allows you to enter Medicaid billing records, and to electronically authorize them for submission to the Oregon Health Authority (OHA) for payment processing.

Your signature below indicates you understand and agree to the following:

- 1) Marking the 'Service provider signature' checkbox on the billing detail screen indicates your authorization to bill a service. It is the equivalent of physically (ink) signing a printed provider log.
- 2) You agree to keep your account password private, and not allow others access to ORMED under your username and password.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
District/ESD

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please sign and date this form and retain in your agency personnel files.

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