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Client Service Memorandum 2020-02

To: All Client Service Staff
Issued By: Aaron Thompson, Rehabilitation Services Director
Authorized By: Stacey Cummings, Program & Policy Director
SUBJECT: COVID-19 Permission for Applicant and Client Signatures
Effective Date: April 8, 2020
Sunset Date: June 30, 2020

PURPOSE: This memorandum serves to outline the process that Vocational Rehabilitation (VR) program staff will follow to obtain applicant/client signatures and defines when it is allowed to obtain written or verbal permission in place of a signature due to telework and the need for social distancing in response to the COVID-19 virus pandemic. This time-limited, verbal/email signature option is in place effective immediately and will remain in effect until regular business operations are reinstated.

APPLICABLE FORMS: This signature option applies to Applications, Eligibility Extension Forms, Individualized Plans for Employment (IPE), IPE Amendments and other official USOR Forms, with the exclusion of the Authorization to Release Protected Health Information Form-45a. Option 1 or the Email Permission Option listed below may be used for the Release of Information Exchange Form-45b.

PROCEDURES:

Option 1

Staff should always first attempt to obtain applicant or client signatures on all USOR forms. Signatures can be obtained by the following options:

1. Email the form to the individual, having them sign the form, scan it or take a clear photo, and then email it back.
2. Send the form for signature through physical mail or by fax. The individual can return the signed form through the same delivery method or drop it off at a USOR office.



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Option 2

If an applicant or client is not able to sign a form through the methods listed above and/or requiring a signature will result in a delay of services, staff may obtain applicant/client agreement to proceed through the following options:

1. Email Permission

- a. Email the form to the individual, explain its purpose, and ask that they reply that they are providing written agreement and consent.
- b. Copy and paste the written agreement into an AWARE case note.
- c. Complete the form by signing and dating in the area designated for USOR staff. On the applicant/client section write, "email permission obtained from applicant/clients" and include the date permission was given.
- d. Send a copy of the completed form back to the client and attach in AWARE.

2. Verbal Permission

- a. Call the individual, explain the details of the form in detail, and address any questions or concerns the individual may have about the form.
- b. Ask if the individual agrees, and document their consent in an AWARE case note.
- c. Complete the form by signing and dating in the area designated for USOR staff. On the applicant/client section write, "verbal permission obtained from applicant/client" and include the date permission was given.

RELEASE OF PROTECTED HEALTH INFORMATION FORM-45: Health and personal information is governed by additional federal rights and privacy laws, therefore the requirements for obtaining client signatures will remain in effect for requesting client medical and/or psychological records. Staff must work with clients to obtain signatures for these documents through physical mail, pdf via email, photo of the document, or a scheduled in office appointment for signature. USOR is temporarily allowing client verbal or email permissions in lieu of signatures for processing Applications, IPes, Financial Needs Assessment, and all other required client service documents.