

West Virginia Board of Occupational Therapy



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POSITION STATEMENT

SUBJECT: Use of Electronic Signatures to Demonstrate Supervision

REVIEW OF LEGISLATIVE RULES: West Virginia Code currently dictates that Direct and General Supervision “is demonstrated through co-signatures on all paperwork pertaining to the practice of occupational therapy for the person requiring direct / general supervision. All paperwork pertaining to the practice of occupational therapy must be signed and dated by the supervising licensed occupational therapist.”

POSITION CLARIFICATION: With the trend toward maintaining records and submitting information electronically, the question of how to meet supervision co-signature requirements is often asked.

The purpose of co-signatures is to document the fact that certain actions occurred in accordance with the predicate rule (e.g. *approved*, *reviewed*, and *verified*). Given the various electronic systems being used with a range of capabilities, this purpose may be accomplished in a variety of ways where electronic records replace paper copies. A system may allow a (C)OTA to forward progress notes to the OT(R) for review and electronic approval. In addition, electronic notes made by supervising OT(R)’s should indicate the date and nature of the supervision provided (i.e. review of progress notes, inspection of service delivery, meeting to review the outcome of service delivery). In all cases, the system must clearly state that it is an “electronic signature”.

Regardless of the system being used, it is the mutual responsibility of the OT(R) and (C)OTA to ensure that the act of supervision is clearly documented and available for inspection in the event of an audit or investigation.