



THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D. C. 20301-1200

AUG 4 2005

HEALTH AFFAIRS

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (M&RA)
ASSISTANT SECRETARY OF THE NAVY (M&RA)
ASSISTANT SECRETARY OF THE AIR FORCE (M&RA)

SUBJECT: Interim Policy Memorandum on Electronic Records and Electronic Signatures for Clinical Documentation

This policy provides interim guidance on electronic signatures until final regulations are published under the Health Insurance Portability and Accountability Act of 1996. It applies to records created, modified, maintained, archived, retrieved, and/or transmitted in electronic form using the Composite Health Care System (CHCS, CHCS II, and CHCS II-Theater), Clinical Information System, and TRICARE Online. These systems have met Information Assurance certification and accreditation and have the processes and technologies for integrity necessary for electronic signature with electronic records.

The Military Health System (MHS) will consider the electronic signatures for these systems to be equivalent to full handwritten signatures and initials, as required by Departmental regulations. Electronic records maintained by MHS Clinical Systems may be used in lieu of paper records, unless paper records are specifically required. This policy does not supersede Department of Defense policy where a digital signature is required (e.g., e-mail).

All personnel must continue to follow the information assurance requirements in place for these systems contained in the System Security Authorization Agreement. This includes acknowledgement of their responsibilities when provided the capability to use electronic signature in a system. The System or local Military Treatment Facility Information Assurance Officers should be contacted for specific details.

Please modify existing policies within 30 days to reflect the provisions of these changes. My point of contact for this issue is Colonel Mark G. Janczewski at (703) 681-5611 ext. 1229 or Mark.Janczewski@tma.osd.mil.


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cc:
Surgeons General of the Military Departments

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