

# **MEMORANDUM OF UNDERSTANDING**

## **Use of Oregon Web Infrastructure for Treatment Services (OWITS) Electronic Health Record (EHR) System by Behavioral Health Treatment Providers**

**HEALTH SYSTEMS DIVISION**

**OREGON HEALTH AUTHORITY**

Revised: March 2016



**Oregon**  
**Health**  
Authority

[www.oregon.gov/OHA](http://www.oregon.gov/OHA)

# **MEMORANDUM OF UNDERSTANDING**

## **Oregon Web Infrastructure for Treatment Services (OWITS)**

### **I. PARTICIPANTS:**

- a. Oregon Health Authority (OHA), Health Systems Division (HSD)
- b. Behavioral Health Providers (hereafter referred to as *providers* or *agencies*):  
Addiction and substance abuse treatment and/or mental health service providers in Oregon which are implementing OWITS, including privately-funded providers, as well as providers that are publicly funded or HSD required reporters (such as DUII or methadone treatment providers)

### **II. MEMORANDUM OF UNDERSTANDING:**

- a. This Memorandum of Understanding (MOU) is made by and between HSD and providers.

### **III. OWITS SYSTEM:**

- a. The participants have formed a collaborative OWITS user group to help maintain OWITS, an Electronic Health Record (EHR). This MOU outlines the framework of the collaborative efforts as well as the responsibilities of both HSD and providers.

### **IV. PURPOSE and RESPONSIBILITIES:**

- a. The above participants enter into this MOU for a common goal of maintaining an EHR known as OWITS. This MOU specifies the participants' responsibilities in the joint effort to accomplish these goals.
- b. Participant responsibilities include:
  1. Providing input for the current and ongoing business requirements.
  2. Reviewing documents related to detail business requirements.
  3. Meeting designated timeframes for completion of full implementation, if applicable (see Attachment A).
  4. Conducting user acceptance testing upon request.
  5. Inputting agency registration and ongoing status and encounter data into the OWITS EHR Production environment.
  6. Correcting errors returned by the automated MOTS data submission process.
  7. Actively participating and collaborating in the implementation of the OWITS EHR and in the ongoing discussions regarding system modifications, upgrades, and enhancements.
  8. Assisting in the ongoing improvement and refinement of the requirements/procedures provided by HSD for using the OWITS EHR.

**V. SPECIFIC RESPONSIBILITIES – HSD:**

- a. Coordinate, consult, and conduct business with Focused eHealth Innovations, Inc. (FEi) to provide the OWITS EHR until June 30, 2016, at which time HSD management will pass support of the OWITS EHR back to the vendor.
- b. Establish open and candid lines of communication using non-technical language with providers.
- c. Establish and maintain the OWITS Forum (<http://owits.boards.net>) for the purpose of allowing HSD and provider staff to discuss potential enhancements, modifications, and additional modules for the OWITS EHR; to ask questions, raise concerns, and share solutions for improving business processes; and to post reference material and notifications of known system bugs.
- d. Provide training and instruction to providers as resources allow.
- e. Proactively work to correct system issues and barriers.
- f. Provide resources for obtaining technical support related to OWITS system errors and issues (for a description of Help Desk tiers and responsibilities for each, see <http://owits.boards.net/thread/533/owits-support>), and notify providers via email or OWITS Announcement of all system outages.
- g. Assist providers in determining current and future business practices that utilize the OWITS EHR.
- h. Include partners when necessary or prudent to create future strategies for implementing additional OWITS EHR domains beyond Substance Abuse and Mental Health throughout Oregon.
- i. Gather all state and federally required data elements for both substance abuse and mental health services and transmit the data from OWITS to MOTS.
- j. Make collected data available to providers for reporting purposes (each agency will only have access to its data).
- k. Follow HIPAA and 42 CFR confidentiality and security policies and procedures. In the event that HSD determines that an agency or HSD employee has participated in or caused any illegal or potentially illegal activity, HSD will revoke all OWITS access rights for that employee; the agency and HSD management will be notified so that further investigation or action can be taken.
- l. Notify providers of changes or updates made to this MOU or other documents related to OWITS EHR.
- m. HSD responsibilities are limited by the following:
  1. HSD will not implement data conversion from any other system into OWITS but may assist in extracting data from OWITS.
  2. HSD will not enter existing client data into the OWITS EHR on behalf of any provider.
  3. HSD will not require fully implemented providers (see Attachment A) to submit data for MOTS reporting separately, if all OWITS EHR modules containing state and federally required data elements normally reported via MOTS are used for all clients. In such cases, no duplicate entry of OWITS EHR and MOTS data will be necessary.
  4. HSD will not provide training to all agency staff. (see d. above)

## VI. SPECIFIC RESPONSIBILITIES – PROVIDERS:

- a. Agree to implement the OWITS EHR out of the box.
- b. Understand that state funding for support and maintenance of the OWITS EHR is available only until July 1, 2016, and that after that date, each provider organization must establish a contract with the vendor in order to pay for ongoing support and maintenance.
- c. Understand that the current state of the OWITS EHR is an ongoing project and may not mirror or accommodate all current business practices or forms.
- d. Agree to utilize the available OWITS EHR modules applicable to agency business practices.
- e. Use computers with a reliable high speed Internet connection (7 mbps or higher, 95% of the time or better).
- f. Be responsible for the establishment and cost of Internet service within their respective agencies.
- g. Understand that the Internet Service Provider (ISP) is responsible for maintaining the Internet connection and any related hardware as stated in its contract.
- h. Be responsible for obtaining and maintaining agency computers as well as providing technical assistance and computer use training to agency staff members.
- i. Ensure that OWITS EHR users possess sufficient computer knowledge and skills (primarily data entry and web navigation) to operate the system independently after training, using reference material provided by HSD when appropriate.
- j. Commit designated staff members to the OWITS EHR implementation process and schedule, including, when applicable, user acceptance testing and requirements gathering.
- k. Allow sufficient time for at least two to three of the proposed OWITS EHR users to participate in training sessions, which may follow a “Train-the-Trainer” format. At least one of the staff members attending the training should be the System Administrator and/or Central Contact described below.
  1. **Train-the-Trainer:** Staff members who attend the sessions to train others within the agency regarding how to access and use the OWITS EHR.
  2. **Agency Administrator:** (may also be the Central Contact) Designated staff member(s) (at least one back up) for creating and maintaining agency staff access and security data in the OWITS EHR. This will be the contact person for HSD regarding technical decisions, Help Desk issues, and system security (see <http://owits.boards.net/thread/533/owits-support>).
  3. **Central Contact:** Designated staff member(s) (at least one backup) to be the Central Contact for the OWITS EHR (may also be the System Administrator—see above). This will be the person with whom HSD maintains communication regarding business, clinical, and data related decisions.
- l. Use the OWITS EHR Support Ticket module or OWITS Support email addresses for all Help Desk issues, except in cases of an OWITS system outage or login issues, in which case contact by phone or email message is preferable.
- m. Enter and maintain up-to-date staff and client data in the OWITS EHR to comply with Health Insurance Portability and Accountability Act (HIPAA) security verification (see Attachment B).

- n. Determine what existing client data (if any) needs to be entered into the OWITS EHR and enter all required data.
- o. Submit Involuntary Commitment and Crisis service data via MOTS.
- p. Determine current business practices and future business practices necessary to implement the OWITS EHR. Business practices are the procedures an agency uses from the moment a person makes contact with a client until that person is discharged or no longer receives treatment services from the agency.
- q. Create new internal policies and procedures or make changes and updates to existing policies and procedures, as needed, to accommodate the OWITS EHR.
- r. Notify HSD in writing in the event of a decision to discontinue using the OWITS EHR. This notification must include a specific date on which usage will end, the reason(s) for the decision, and what changes (if any) would have to occur for this decision to be reconsidered. Providers that discontinue OWITS EHR use are expected to continue to submit required data via MOTS as specified by the administrative rules. HSD is not responsible for but may assist with data conversion from OWITS to other EHR systems.
- s. Maintain licensure or certification as an addiction treatment or mental health treatment service provider as appropriate.
- t. Become fully implemented in OWITS production within 6 months of final training (see Attachment A).

## **VII. RECOGNITION**

- a. HSD and the providers will work collaboratively and in partnership with each other to maintain and implement ongoing use of OWITS as an EHR.
- b. All participants recognize that OWITS EHR modules that do not contain state or federally required data elements only represent system capabilities. Business policies and decisions made by individual provider agencies and facilities will dictate which of these non-required modules will be used and in what circumstances.
- c. All users are expected to use the OWITS EHR in compliance with existing rules and regulations, including internal policies.
- d. At such time that HSD is no longer able to provide funding for OWITS maintenance and support (June 30, 2016), providers will assume financial responsibility or choose alternative methods of reporting required data (EDI or MOTS Client Entry).

**VIII. CONCURRENCE**

**Health Systems Division**

Signature below indicates sponsorship of this MOU, including attachments.

<b><u>Print Name:</u></b>	<b><u>Title:</u></b>
<b><u>Signature:</u></b>	<b><u>Date Signed:</u></b>
<b><u>Print Name:</u></b>	<b><u>Title:</u></b>
<b><u>Signature:</u></b>	<b><u>Date Signed:</u></b>

**Provider Agency**

Signature below indicates agreement with this MOU, including attachments.

This MOU may be subject to changes. Notice of changes will be provided.

<b><u>Agency Name:</u></b>	<b><u>County</u></b>
<b><u>Print Name:</u></b>	<b><u>Title:</u></b>
<b><u>Signature:</u></b>	<b><u>Date Signed:</u></b>
<b><u>Print Name:</u></b>	<b><u>Title:</u></b>
<b><u>Signature:</u></b>	<b><u>Date Signed:</u></b>

Sign and fax to: 503-947-5043  
Attn: OWITS System Administrator  
Or  
Mail to:  
Attn: OWITS System Administrator  
500 Summer Street NE  
Salem, Oregon 97301-1064

## Attachment A

### Definition of Fully Implemented

Fully implemented providers have completed all required setup and training as described in in the policy below and have been signed off by an account coordinator.

Access to the OWITS EHR Training environment is granted during the training process. Providers are required to close all lapsed MOTS records and work with state MOTS Support staff to resolve all existing MOTS errors before access will be granted to the OWITS EHR Production environment. When Production access is granted, providers will be required to enter data for all active treatment cases.

Involuntary Commitment and Crisis services must be submitted by MOTS.

## Attachment B

### HIPAA Required Security Verification

HSD may require user verification upon receiving requests to access client information or view or modify client data in OWITS.

#### Phone Call Requests

Users must identify themselves by giving the following information: first name, last name, the name of the agency they work for or represent, and their date of birth.

#### Email Requests

All requests related to staff accounts should be sent to [OWITS.SUPPORT@state.or.us](mailto:OWITS.SUPPORT@state.or.us). The Sender/From email address must be documented in OWITS. Multiple email addresses can be entered in the Staff Member Workspace record for each staff member. The primary email address in the staff member's profile should contain the business email address (if available), such as: [john.smith@smithagency.org](mailto:john.smith@smithagency.org). Alternate email addresses may be entered if business-related email messages are sent from that account when the primary business email account is not accessible, such as when a user would be working remotely. An example personal email address would be: [johnnyS@yahoo.com](mailto:johnnyS@yahoo.com). Email addresses containing inappropriate language are not permitted and will be removed by the HSD system administrators.

HSD will verify staff member's security level and access to client information. If access or security information indicates the user should not be given client information, HSD staff will refer the user to the Agency Administrator.

If person contacting HSD requesting client information cannot be verified as a valid OWITS user, HSD will contact the Agency Administrator to alert them of the suspicious inquiry.

For password reset requests, it is the users' responsibility to alert OWITS Support if an alternate email address is to be used. The default for sending password resets is the primary email address.