



**North Carolina Department of Health and Human Services  
Division of Health Service Regulation**

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**MEMORANDUM**

December 11, 2007

To: Home Care Agencies Providing In-home aide Services

From: Jeff Horton

RE: Clarification of home care licensing rules pertaining to using telephonic record keeping

Medicaid Personal Care Services (PCS) policy states that a home care agency providing Personal Care Services (PCS), which intends to implement a telephonic record keeping system, must use a system that meets the criteria established by the Division of Medical Assistance (DMA) in the PCS policy (DMA Clinical Coverage Policy No.: 3C Personal Care Services 7.12, 7.12.1 and 7.12.2). The Division of Health Service Regulation approves the use of telephonic record keeping in a home care agencies as long as the agency's policies and procedures outline the procedure for this type of record keeping and are consistent with the rules for Service records and documentation requirements set forth in the Home Care Licensure Rules (NCAC 13J .1401 and .1402)

Concerning the requirement in Home Care Licensure rules regarding the signature of the in-home aide on the service logs [NCAC 13J.1402(a)(2)(C)], if the telephonic system meets the requirements of an aide signature on the service log, a printed hard copy with the aide signature on the log is not necessary. In addition, it is important to adhere to your agency's policies and procedures for the use of telephonic systems and for any electronic signatures and assure that electronic signatures can be authenticated if needed.

We hope this memo clarifies the issue of using telephonic record keeping and compliance with the home care licensing rules. If you have questions or if we can be of further assistance, please do not hesitate to contact our office.

Cc: Division of Medical Assistance  
Association for Home & Hospice Care of NC



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