

# EAST STROUDSBURG AREA SCHOOL DISTRICT

SECTION: OPERATIONS

TITLE: ELECTRONIC RECORDS/  
SIGNATURES

1<sup>st</sup> READ: FEBRUARY 24, 2014

830. ELECTRONIC RECORDS/SIGNATURES	
1. Purpose	Under certain conditions, electronic records and signatures satisfy the requirements of a written signature when transacting business. The East Stroudsburg Area School District wishes to promote effective and efficient use of electronic communications to conduct business. Although all electronic signatures are represented digitally, they can take many forms and can be created using many different types of technology. The authenticity and reliability of electronic records and signatures relating to transactions are dependent on the accompany processes, supplemental records and the overall context in which records are created, transferred, signed and stored. The East Stroudsburg Area School District adopts the following policy with respect to the use of electronic records and signatures in connection with the transaction of district business. This includes the School-Based ACCESS Program (SBAP).
2. Definitions 15 U.S.C. Sec. 7006	<p><b>Electronic Signature</b> – an electronic sound, symbol or process attached to or logically associated with a record and executed or adopted by a person with the intent to sign the record.</p> <p><b>School-Based ACCESS Program</b> – a program that allows Local Education Agencies (LEAs) to receive Medicaid reimbursement for IEP medically necessary health-related services provided to students who are eligible for Medical Assistance (MA).</p> <p><b>Electronic Record</b> – any record created, generated, sent, communicated, received or stored by electronic means.</p>
3. Authority	As permitted under the SBAP, electronic signatures may satisfy the requirements of a written signature of SBAP provider logs. The Board recognizes that the authenticity and reliability of electronic signatures are dependent on the processes accompanying the use of such signatures.
4. Delegation of Responsibility	The Superintendent or designee may develop administrative procedures necessary to implement this policy.
5. Guidelines	<p>Electronic signatures shall have the full force and effect of a manual signature only if the electronic signature satisfies all of the following requirements:</p> <ol style="list-style-type: none"> <li>1. The electronic signatures identifies the individual signing the document by his/her name and title;</li> </ol>

2. The electronic signature and the document to which it is affixed cannot be altered once the electronic signature has been affixed;
3. The identity of the individual signing with an electronic signature is capable of being validated through the use of an audit train; and
4. The electronic signature conforms to all other provisions of this policy.

The district shall develop and maintain an electronic record keeping system that can receive, store, and reproduce electronic records and signatures relating to transactions in their original form. Such system shall include security procedures whereby the district can:

1. Verify the attribution of a signature to a specific individual;
2. Detect changes or errors in the information contained in a record submitted electronically;
3. Protect and prevent access, alteration, manipulation or use by an unauthorized person; and
4. Provide for non-reproduction through strong and substantial evidence that will make it difficult for the signer to claim that the electronic representation is not valid.

The district will receive and accept as original, electronic records and signatures so long as the communication, on its face, appears to be authentic.

The district will retain in its records this policy and all statements of exclusive use, until such time as all legally mandated retention requirements are satisfied.

The district shall maintain a secure hard copy log of the PIN/Password or actual signature of any individual authorized to provide an electronic signature in connection with the SBAP.

References:

Pennsylvania Electronic Transactions Act – 73 P.S. Sec. 2260.101 et seq.

U.S. Electronic Signatures in Global and National Commerce Act – 15 U.S.C. Sec. 7001 et seq.