

COMMONWEALTH CHARTER ACADEMY

BOARD OF DIRECTORS POLICY SECTION: 800 OPERATIONS

840. ELECTRONIC SIGNATURES

§ 1. Purpose and Authority

The Board recognizes that electronic signatures may be utilized to promote the efficient, time sensitive, and cost-effective administration of Commonwealth Charter Academy business. The effectiveness of the use of electronic signatures depends upon the authenticity and reliability of the signatures. The Board seeks to promote the effective and efficient use of electronic signatures to conduct CCA business. The Board establishes this policy to use and accept electronic signatures in lieu of signed original documents.

The Board directs the CEO or designee to develop the administrative guidelines or regulations required to implement this policy.

§ 2. Definitions

Unless the context clearly indicates otherwise, the following terms used in this policy shall have the following meanings:

Attribution – An electronic signature is attributable to a person if it identifies the individual signing the document, if it is the act of the person with the intent to sign the document, and if the totality of the circumstances validate the signer's identity.

Electronic Signature – 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.

§ 3. Guidelines

Electronic Signatures Authorized / Limitations

Electronic signatures may be used in lieu of manual signatures to conduct CCA business unless a manual signature is otherwise required by law. An electronic signature shall have the full force and effect of a manual signature when the authenticity and reliability of such electronic signature meets the provisions of this policy, its accompanying administrative guidelines, and CCA's electronic signature security procedures. CCA's electronic signature security procedures shall, at a minimum, provide methods to:

1. Verify the identity of the individual signing the document;
2. Reliably attribute a signature to a particular individual;
3. Prevent access, alteration, manipulation, or use of the electronic signature by any unauthorized person(s);

4. Prevent nonrepudiation through procedures that make it difficult for a signer to claim that the electronic signature is not valid; and,
5. Prevent the alteration of any document after the signature has been affixed.

No individual acting on behalf of CCA shall rely upon any electronic signature that is not compliant with this policy and the procedures established to implement this policy, nor shall any individual acting on behalf of CCA rely upon any electronic signature if the document or signature, on its face, appears to be forged, altered, or otherwise not authentic. In such a case, the CEO or designee may require a manual signature.

The CEO or designee shall identify individuals authorized to utilize an electronic signature in connection with CCA business. CCA shall maintain a secure log of every individual authorized to utilize an electronic signature in connection with CCA business, along with a copy of their unique electronic signature, and shall require each individual so authorized to sign a statement of exclusive use of their unique signature. CCA shall maintain the secure log, electronic signatures, and statements of exclusive use until the legally mandated retention requirements are satisfied.

Abuse of the electronic signature protocols by any CCA employee serves as grounds for disciplinary action, up to and including termination.

Distribution of Policy

This policy is hereby incorporated by reference into CCA's Employee Handbook and Learner Handbook and shall be posted on CCA's publicly accessible website.

History:	Adopted 2-13-19
Previous Policy No.:	None
Legal Ref.:	73 P.S. § 2260.101 <i>et seq.</i> ; 15 U.S.C. § 7001 <i>et seq.</i>
Cross Ref.:	None