



COMPREHENSIVE COMMUNITY SERVICES POLICY AND PROCEDURES

V6.8.2022

SUBJECT: Electronic Records and Signatures

PURPOSE

Describes allowable use of electronic records and signatures within the Dane County Comprehensive Community Services (CCS) program.

POLICY

For Dane County to operate an efficient CCS program that remains in compliance with all requirements outlined by ForwardHealth and Wisconsin Administrative Code, use of electronic documents, including electronic client records, and electronic signatures are allowed as authorized by law. (Wis. Stats. Chapter 137)

Electronic Records

- 1) Electronic record means a record that is created, generated, sent, communicated, received, or stored by electronic means.
- 2) If a law requires a record to be in writing, an electronic record satisfies that requirement in that law.
- 3) If a law requires that a record be retained, the requirement is satisfied by retaining the information set forth in the record as an electronic record which accurately reflects the information set forth in the record after it was first generated in its final form as an electronic record or otherwise; and remains accessible for later reference. It is not necessary to retain a hard copy in addition to an electronic copy of a record.
- 4) All electronic CCS records will be retained for the duration specified in law.

Electronic Signature

- 1) Electronic signature means 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.
- 2) General conditions for a valid electronic signature include:
 - a. The signer demonstrated a clear intent to sign.
 - b. The signer has consented to complete the signature electronically.
 - c. The electronic signature is connected to the document being executed.
 - d. A records of the electronic transaction is retained and must be accurately reproduced if necessary.
- 3) Electronic signatures may be utilized on any document that requires a signature or a written signature. If ForwardHealth policy requires a "handwritten signature", an electronic signature will not be accepted.
- 4) An electronic signature is attributable to a person if the electronic signature was created by the act of the person. The act of the person may be shown in any manner, including a showing of the efficacy of any security procedure applied to determine the person to which the electronic signature was attributable.

- 5) The parties may make electronic signatures by typing the name of the authorized signature followed by the words, “electronically signed” or by any other electronic means representing an authorized signature.
- 6) CCS providers and participants may submit an email indicating approval of a document as a type of electronic signature or may send a picture of a signed document. Electronic signatures received in this manner will be saved in the CCS client chart.
- 7) It is a violation of this policy for an individual to falsify an electronic signature or to affix a signature for another individual, unless they have been granted specific, written or electronic authority by that individual.
- 8) CCS participants cannot be required to utilize electronic signatures. If requested, paperwork and forms must be provided in hard copy for CCS participants to sign with a wet-ink signature.

Approved by CCS Coordination Committee on September 21, 2022.
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