

**Virginia Service Commission
Electronic Guidance**



“A program may store member files electronically and use electronic signatures if the program can ensure the validity and integrity of the record and signature is maintained.”

- *CNCS Specific Terms and Conditions IX.A.*

AMERICORPS POLICY ELECTRONIC STORAGE OF MEMBERS FILES

Background: Typically, programs store member eligibility documentation, timesheets, and other relevant documents in paper files which become cumbersome to maintain and store. Programs have asked if electronic storage is permissible. Sections 1703 and 1705 of the Government Paperwork Elimination Act (GPEA) state that electronic records are not to be denied legal effect, validity, or enforceability merely because they are in electronic form.

Policy: This policy allows AmeriCorps State and National grantees the option of storing member files in electronic formats, when practicable. It also provides minimum standards that such systems must meet.

Minimum Standard for Electronic Document Storage:

A program may store member files electronically if the program can ensure that the validity and integrity of the record is not compromised. The Corporation will recognize electronically stored files where:

1. The electronic storage procedures and system provide for the safe-keeping and security of the records, including:
 - a. Sufficient prevention of unauthorized alterations or erasures of records;
 - b. Effective security measures to ensure that only authorized persons have access to records;
 - c. Adequate measures designed to prevent physical damage to records; and
 - d. A system providing for back-up and recovery of records; and

2. The electronic storage procedures and system provide for the easy retrieval of records in a timely fashion, including:
 - a. Storage of the records in a physically accessible location;
 - b. Clear and accurate labeling of all records; and
 - c. Storage of the records in a usable, readable format.

NOTE: All current grant provisions regarding paper records, including access restrictions, security, privacy, and retention, also apply to electronic records.

Your organization should have a policy about where documents are stored electronically and who has access to these documents.

ELECTRONIC SIGNATURES

A valid electronic signature on an electronic document is one that is created with an electronic signature device that is:

- Uniquely entitled to a signatory
- Not compromised
- Used by a signatory who is authorized to sign the electronic document

AmeriCorps program documentation, including, but not limited to:

- MSA
- Member handbook/acceptance of policies
- Contract Addendums
- Position Description
- Adjudication of Fieldprint results
- Program Change Request Forms

A valid electronic signature is created using an electronic signature device, such as DocuSign or Adobe Pro, by an authorized signatory and includes a timestamp.

Typing your name into a form does not constitute a valid electronic signature.