



2010 SOUTHWEST CLUSTER CONFERENCE

MARCH 2-4, 2010

DALLAS, TEXAS

Electronic Timekeeping and Electronic Storage

C. 7. Electronic timekeeping systems

FAQ Number: 0611PU2

May I use an electronic timekeeping system as my system of record?

ASN 06-006 Policy to Allow Electronic Timekeeping Systems as System of Record, effective 11/13/06

Background: The Government Paperwork Elimination Act of 1998 (GPEA) states that electronic records and related electronic signatures are not to be denied legal effect, validity, or enforceability merely because they are in electronic form. (Pub. L. 105-277, Title XVII).

Policy: This policy allows AmeriCorps State and National grantees to use electronic timekeeping systems as the system of record. It also provides minimum standards that such systems must meet.

Minimum Standard for Electronic Timekeeping Systems:

Electronic timekeeping systems are allowed as the system of record when three conditions are met:

1. You have an established written policy establishing the use of electronic timekeeping system as your system of record; and,
2. You have a secure, verifiable electronic signature system that (a) identifies and authenticates a particular person as the source of the electronic signature; and (b) indicates such person's approval of the information contained in the electronic message.
3. Once appropriate electronic signatures have been applied, no changes may be made unless there is a clear, auditable record of the revision.

All current grant provisions regarding timekeeping records, including access restrictions, security, privacy, and retention, also apply to records maintained in an electronic timekeeping system.

The use of regular e-mail to communicate approval is not a secure, verifiable electronic signature system.



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C. 6. Electronic storage of member files

FAQ Number: 0611PU2

What is the policy on electronic storage of member files?

ASN 06-005 Policy on Electronic Storage of Members Files, effective 11/13/06
Typically, programs store member eligibility documentation, timesheets, and other relevant documents in paper files which become cumbersome to maintain and store. Sections 1703 and 1705 of the Government Paperwork Elimination Act states that electronic records are not to be denied legal effect, validity, or enforceability merely because they are in electronic form. 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:

The electronic storage procedures and system provide for the safe-keeping and security of the records, including:

- Sufficient prevention of unauthorized alterations or erasures of records;
- Effective security measures to ensure that only authorized persons have access to records;
- Adequate measures designed to prevent physical damage to records;
- A system providing for back-up and recovery of records;
- and

The electronic storage procedures and system provide for the easy retrieval of records in a timely fashion, including:

- Storage of the records in a physically accessible location;
- Clear and accurate labeling of all records; and
- 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.