

ASN 06-006 Policy to Allow Electronic Timekeeping Systems as System of Record

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 your 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 your 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. Secure e-mail systems that are integrated with a secure, verifiable electronic signature are acceptable.

When does this policy go into effect?

November 13, 2006.