

**ELECTRONIC SIGNATURE/DATA ACCESS POLICY**

This policy is adopted by Bixby Public Schools (“District”) and defines the access to data and what transactions staff members are permitted to complete as outlined in the policy rules for electronic records and electronic signatures contained in paragraph 2 of the OAXC 317:30-3-4.1, also known as the “Uniform Electronic Transaction Act” and OAXC 317:30-3-15 regarding record retention.

Only staff members designated by the District may make entries in the student’s medical record. All entries in the student’s medical record must be dated and authenticated with a method established to identify the author. The identification method may include computer keys or Private/Public Key Infrastructure (PKIs).

Consistent with existing District Policy, all access to electronic systems will be immediately deactivated for any staff member who is terminated or resigns.

When PKIs, computer key/code(s), or other codes are used:

- A signed statement must be completed by each staff member documenting that the chosen method is under their sole control
- A list of PKIs, computer key/code(s), voice authentication systems or other codes can be verified by the District
- All adequate safeguards are maintained to protect against improper or unauthorized use of PKIs, computer keys, or other codes for electronic signatures
- Staff members will be sanctioned, up to and including termination, for improper or unauthorized use of computer key/codes(s), PKIs, voice authentication systems or other code types of electronic signatures.

The District will enact sanctions for improper or unauthorized use of computer key/code(s), PKIs, voice authentication systems or other code types of electronic signature.

The District will require that there be a specific action by the author to indicate that the entry is verified and accurate. The District will require computerized systems that require the staff member to review the document on-line and indicate that it has been approved by taking specific action to verify it using their authenticated access.

The District establishes that records must be authenticated by the original author prior to claims submission and that no edits may be made unless done so by a designated administrator within the facility. Edits must be in the form of a correcting entry so that the content of the original document is not altered. All edits must be completed prior to the time of claims submission.

The District establishes that the electronic signature, for clinical documentation, shall be deemed to constitute a signature and will have the same effect as a written signature on the clinical documentation. The section of the electronic record documenting the service provided must be authenticated by the staff member who provided the described service. If allowed by the State Medicaid Plan, therapists supervising aides will have the authority to approve, but not edit or change, the services documented by therapist aides.

Any authentication method for electronic signatures that the District adopts must:

- (i) Be unique to the person using it;

- (ii) Identify the individual signing the document by name and title;
- (iii) Be capable of verification, assuring that the documentation cannot be altered after the signature has been affixed;
- (iv) Be under the sole control of the person using it;
- (v) Be linked to the data in such a manner that if the data is changed, the signature is invalidated; and
- (vi) Provide strong and substantial evidence that will make it difficult for the signer to claim that the electronic representation is not valid.

*Adopted: 6/18/12*