


Name of Policy: <u>Electronic signatures</u> Policy Number: 3364-15-16 Approving Officer: President Responsible Agent: Executive Director of Internal Audit and Chief Compliance Officer Scope: All University of Toledo campuses		 Review/Revision Date: January 24, 2022 Original effective date: June 1, 2015	
Key words: electronic, sign, authority, authorization, approval, approve, execution, execute, contract, credential, authenticate, authentication, security, non-repudiation, repudiate, scan, agreement, integrity			
<input type="checkbox"/>	New policy proposal	<input checked="" type="checkbox"/>	Minor/technical revision of existing policy
<input type="checkbox"/>	Major revision of existing policy	<input type="checkbox"/>	Reaffirmation of existing policy

(A) Policy statement

Electronic transactions conducted in accordance with this policy shall have the same legal effect as paper-based transactions. The University of Toledo (UToledo) through its IT Security Office, which can be found at <http://www.utoledo.edu/it/security/> has established procedures to provide authentication, non-repudiation, and integrity to the extent reasonable for each electronic transaction.

(B) Purpose of policy

Prior to using or accepting electronic signatures, Ohio law requires that UToledo establish security procedures that govern the use of electronic signatures and ensure the authenticity, integrity, and non-repudiation of such signatures. The use of electronic signatures, as directed by the policy, can potentially facilitate the timely execution of activities across UToledo, including personnel actions; contract signatory authorizations; release of educational records (e.g., transcripts, medical degree verifications, third-party credentialing services that request records on behalf of former students (Federation Credentials Verification Service, Certified Screening, etc.)); and other activities requiring confirmation of acceptance.

(C) Scope

This policy applies to all electronic transactions entered on behalf of UToledo.

- (D) Electronic signatures in Electronic Medical Records/Electronic Health Records (EMRs/EHRs)
- (1) Electronic signature, an automated function which replaces a handwritten signature with a system generated signature statement, will be utilized for medical records as a means for authentication of transcribed documents, computer generated documents and/or electronic entries. System generated electronic signatures are considered legally binding to identify the author of medical record entries and confirm that the contents are what the author intended.
 - (2) Providers will be allowed to utilize electronic signature in accordance with this policy and State and Federal regulations regarding such.
- (E) References
- (1) Electronic Signatures Procedures (Institutional Compliance webpage)
<https://www.utoledo.edu/offices/internalaudit/institutional-compliance/docs/electronicsignatureprocedures20210608.pdf>.
 - (2) UToledo Policy 3364-40-15 Procurement Policy
<http://www.utoledo.edu/policies/administration/finance/pdfs/3364-40-15.pdf>.
 - (3) UToledo Policy 3364-40-08 Delegation of Signatory, Authority for Documents that Bind the University
https://www.utoledo.edu/policies/administration/finance/pdfs/3364_40_08.pdf.
 - (4) Ohio Revised Code §1306

<p>Approved by:</p> <p><u>/s/</u> <hr/> Gregory C. Postel, M.D. President</p> <p><u>January 24, 2022</u> <hr/> Date</p> <p><i>Review/Revision Completed by:</i></p> <p><i>Executive Director of Internal Audit and Chief Compliance Officer, SLT</i></p>	<p>Policies Superseded by This Policy:</p> <ul style="list-style-type: none"> • <i>None</i> <p>Initial effective date: June 1, 2015</p> <p>Review/Revision Date: August 1, 2018; January 24, 2022</p> <p>Next review date: January 24, 2025</p>
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