

Electronic Signature Clarification

Iowa Medicaid Enterprise provided guidance to Veridian Fiscal Solutions regarding electronic and photocopied signatures on documents.

- (1) A photocopy of an entire original document containing the original wet signature of the consumer.
Guidance: This example is not an electronic signature. It is a copy of an original document and is acceptable.
- (2) The insertion by the consumer of a photocopy of a signature on a document after the consumer has reviewed the document.
Guidance: This example is considered an electronic signature and would not be acceptable because there are no security measures in place to ensure that the signature is the consumer's signature and that the consumer has approved the time.
- (3) The insertion by the Independent Support Broker (ISB) or employee of a photocopy of a consumer's signature on a document.
Guidance: This is not a signature, electronic or otherwise. Signatures must be accompanied by an intent to sign. When the ISB or employee uses a photocopy of a consumer's signature on a document, there is no evidence that the consumer intended to sign the document. The inclusion of such a signature by the ISB or employee is potentially fraudulent.
- (4) The ISB or employee photocopying blank time card sheets with the consumer signature filled in.
Guidance: Similar to (3) above, this example is not a signature because there is no intent to sign the document. The use of blank time cards with a photocopied signature is potentially fraudulent.
- (5) The ISB or employee obtaining wet signatures on blank time card sheets is also not acceptable for the same reasons as outlined in (4) above.