To:              All DOR Employees (DORALL)

                   Departmental Partners

From:         Armel Biscocho, Deputy Director

                   Administrative Services Division

Kathi Mowers-Moore, Deputy Director

                   Vocational Rehabilitation Policy and Resources Division

Date:          October 27, 2020

Subject:     **Interim Policy – Using Email for Electronic Signatures (Revised)**

This memorandum serves to update the Interim Policy – Using Email for Electronic Signatures (published April 16, 2020, and later revised on May 8, 2020).

Revisions to this policy are: (1) permitting use of email correspondence for electronic signature for a consent to release or obtain personal information (e.g., DR 260 Consent to Release and Obtain Information form); and (2) referring Department of Rehabilitation (DOR) staff to separate, linked supportive guidance.

**BACKGROUND**

On March 4, 2020, Governor Newsom declared a State of Emergency and on March 19, 2020, Governor Newsom issued a Stay at Home order statewide and declared government operations as essential. To further the purpose and intent of these orders, DOR’s electronic signature policy allows critical program services and business operations to continue.

**INTERIM POLICY**

Effective immediately, until further notice, DOR will accept email correspondence as an acceptable means of electronic signature on all internal and external documents for program areas, business services, and administrative and accounting processes. Specifically, email correspondence is considered an acceptable method for a signature received from program recipients and participants, cooperative partners, service providers, vendors, and DOR staff.

While DOR has established an email correspondence process as a method of electronic signature, it is important to note that other parties involved in a transaction must also agree to utilize the email correspondence protocol (e.g., parties to a contract or an entity receiving an authorization to release personal confidential information). As an example, due to the signature requirements of the Social Security Administration, the DOR is unable to process the SSA 3288 Social Security Administration – Consent for Release of Information form, without a wet signature.

Additionally, wet signatures and / or DOR email correspondence protocol may not meet the needs of some individuals with disabilities, and DOR staff, in collaboration with the individuals, and their representatives as appropriate, will explore alternatives to meet their reasonable accommodation needs. These alternatives will need to be identified and discussed with any third party associated with any specific document.

**PROCEDURES / TEMPLATES TO ASSIST DOR STAFF:**

The following procedures and templates are being provided to DOR staff to support the effective use of email correspondence as an electronic signature, and encryption as necessary, applicable to both internal and external documents:

        Standardized Email Template to Attribute a Signature via Email

        Procedure for Attaching Email to Record of Services in Aware

        Procedure for Encrypting Emails with Sensitive Information

**RESOURCES**

Applicants, consumers, and their representatives who have questions about this policy may contact a local DOR office or their Rehabilitation Counselor.

Staff members may direct inquiries to their Team Managers or District Operations Support (DOS) Managers. Regional Directors, District Administrators, DOS Managers, and Team Managers may direct policy questions to program.policy@dor.ca.gov.

Contract Administrators may contact the Cooperative Programs Section email at cssinfo@dor.ca.gov and Cooperative partners may contact their assigned DOR Cooperative Program Specialist.

Community Rehabilitation Programs may contact the DOR Community Resources Development Section at crdssinfo@dor.ca.gov or their assigned DOR CRD Specialist.

Contractors, vendors, and DOR staff with questions regarding contracts and procurement, please email contractsinfo@dor.ca.gov.

For accounting questions, please email Accounting.Section@dor.ca.gov.