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Department of Health Care Services



EDMUND G. BROWN JR.  
GOVERNOR

**PPL NO. 16-010**

DATE: June 10, 2016

TO: Local Educational Agencies (LEAs), Local Educational Consortiums (LECs),  
Local Governmental Agencies (LGAs)

SUBJECT: **IMPLEMENTATION OF ELECTRONIC SIGNATURE POLICY**

This Policy and Procedure Letter (PPL) notifies LEAs, LECs and LGAs participating in the LEA Medi-Cal Billing Option Program, County-Based Medi-Cal Administrative Activities, School-Based Medi-Cal Administrative Activities and Targeted Case Management of guidelines regarding the use of electronic signatures in electronic health records (EHRs). The use of an electronic signature refers to the act of attaching a signature by electronic means. These guidelines will become effective on or after July 1, 2016.

California Civil Code § 1633.2 defines an electronic signature as “an electronic sound, symbol, or process attached to or logically associated with an electronic record and executed or adopted by a person with the intent to sign the electronic record.”

The Department of Health Care Services approves the use of electronic signatures in EHRs as equivalent to a manual signature affixed by hand. Per the guidelines issued by the Centers for Medicare and Medicaid Services (CMS), systems and software products used to affix electronic signatures must include protections against modification. Providers must apply administrative safeguards to ensure that the electronic signature meets the following criteria:

- It identifies the signing individual by name and title;
- It is unique to the person using it and under his or her sole control;
- It is capable of verification; and
- It assures the document cannot be altered after the signature has been affixed.

The signing individual and the provider bear responsibility for the authenticity of the information for which an attestation has been provided.

If you have questions concerning this PPL, please contact Rick Record, Chief, LEA Medi-Cal Billing Option Program, by phone at (916) 552-9222 or by e-mail at [Rick.Record@dhcs.ca.gov](mailto:Rick.Record@dhcs.ca.gov).

Sincerely,

**ORIGINAL SIGNED BY MICHELLE KRISTOFF**

Michelle Kristoff, Chief  
Medi-Cal Administrative Claiming Section