

RESOLUTION NO. 2025-105

**RESOLUTION ADOPTING A POLICY FOR ACCEPTING ELECTRONIC CERTIFIED
PAYROLL REPORTS ON CERTAIN FEDERALLY FUNDED PROJECTS**

WHEREAS, the City of Eagle Grove, Iowa (CITY), has received funding from various federal agencies including the Department of Housing and Urban Development (HUD) where requirements of the funding include the submission of Davis-Bacon Payroll reports; and

WHEREAS, the City can see the benefit of allowing contractors on these federally funded projects to submit their payrolls reports by electronic means when they comply with certain digital security measures; and

WHEREAS, the Department of Labor and HUD have developed a policy and certain requirements to ensure that payrolls submitted electronically are compliant with federal requirements and law when submitted in electronic formats; and

WHEREAS, the use of electronic documents for the delivery and signature of payrolls required by federally funded projects can have significant benefits for both the City, the City's Grant Administrator, and the contractor.

NOW, THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF EAGLE GROVE, IOWA

SECTION 1. That the City Council approves the attached Electronic Certified Payroll Reports Policy for current and future federally funded policies undertaken by the City when the contractors on the policy comply with the standards set forth in the policy.


SECTION 2. That the Mayor be authorized to sign the Electronic Certified Payroll Report Policy following approval by the Council.

SECTION 3. That the Clerk is authorized to notify all Grant Administrators for any federally funded projects that this policy has been approved and is hereby in effect for those projects that they are administering.

SECTION 4. That the Grant Administrator is granted permission to provide notification of the City's adoption of this policy to contractors working on City projects funded by the federal funds and to provide said contractors with the requirements of the policy for submitting federal payrolls in electronic format under this policy.

PASSED AND APPROVED THIS 15TH DAY OF SEPTEMBER 2025.

BY THE CITY COUNCIL OF THE
CITY OF EAGLE GROVE, IOWA



Michael Boyd, Mayor

ATTEST



Bryce Davis, City Administrator

Policy & Procedures for Accepting and Retaining Certified Payrolls with Electronic Signatures

Agency: **CITY OF EAGLE GROVE, IOWA**

Effective Date: **SEPTEMBER 15, 2025**

1. Purpose:

To establish a policy for accepting certified payroll reports with electronic signatures in compliance with the Davis-Bacon and Related Acts (DBRA), HUD regulations, and the Electronic Signatures in Global and National Commerce (E-SIGN) Act.

2. Authority:

This policy is authorized by:

- [HUD Handbook 1344.1 Rev 2, Chapter 4](#);
- U.S. Department of Labor guidance on WH-347 certified payroll forms;
- [15 U.S.C. § 7001 \(E-SIGN Act\)](#);
- [29 CFR Part 3](#);
- [29 CFR Part 5](#);

3. Scope:

This policy applies to all contractors and subcontractors performing DBRA-covered work on projects funded in whole or in part with HUD assistance administered by **CITY OF EAGLE GROVE, IOWA**.

4. Electronic Signature Requirements:

The grantee may accept certified payrolls signed electronically, provided the following requirements are met:

a. Authentication

- Each signer must use a unique login credential or digital signature;
- The system must verify the identity of the signer;

b. Intent and Consent

- The signatory must explicitly agree to the Statement of Compliance, consistent with the WH-347 form;
- The signature must be applied intentionally and include the date of signature;

c. Integrity

- Once submitted, payroll reports must be locked or tamper-evident;
- Any changes after signature must be clearly recorded in an audit trail;

5. Submission Process:

Contractors and subcontractors may submit certified payroll reports using:

- An approved third-party system (e.g., LCPtracker, Elation Systems, etc.);
- A secure internal portal or email, provided all signature requirements are met;

Electronic Signature Compliance Checklist for Certified Payrolls

Checklist for electronic system compliance with DOL & HUD requirements.

1. Authentication of Signer:

- The electronic signature must be unique to the individual using it;
- The signatory's identity is verified (e.g., user ID + password, secure login);
- The system restricts access to the signer only;
- There is a method to prevent unauthorized use of the signature;

2. Affirmation of Intent & Consent:

- The system includes a certification statement (must align with DOL form WH-347's language under "Statement of Compliance");
- The signer affirmatively agrees (clicks or signs) to certify the payroll under penalty of perjury;
- The electronic signature process captures the date and time of signature;

3. Document Integrity & Tamper-Proofing:

- The signed document is locked or read-only after submission;
- Any edits or changes after signature invalidate the certification or trigger an audit trail;
- A tamper-evident audit trail is maintained for each signed payroll;

4. Recordkeeping and Accessibility:

- Payroll records, including electronic signatures, are retained for at least 3 years after project closeout;
- Records are readily accessible for review by HUD, DOL, or auditors;
- The system allows PDF exports or printouts of signed payrolls in a standard format (provides the same data as represented in the DOL form WH-347);

5. Compliance with Legal Standards:

- The signature method complies with the E-SIGN Act (15 U.S.C. § 7001) and/or UETA (Uniform Electronic Transactions Act);
- The process conforms to HUD Handbook 1344.1 Rev 2, Chapter 4 (Labor Standards Administration);
- If using a third-party platform (e.g., LCPtracker, Elation), the system's compliance documentation is on file;

6. Grantee Internal Controls:

- A written policy is in place stating electronic certified payrolls and signatures are accepted and compliant;
- Staff are trained to review and verify digitally signed submissions;
- The policy includes procedures for exception handling, errors, or system outages;

Electronic Signature Compliance Checklist for Certified Payrolls

Sample Acceptable Tools:

Tool	Meets Checklist?	Notes
LCPtracker	Yes	Industry standard; widely used by HUD grantees.
Elation Systems	Yes	HUD-compliant platform.
Adobe Sign / DocuSign	Yes (if properly configured)	Must restrict signer access and provide audit trails.
Email PDF with typed name	No (by itself)	Only acceptable with additional authentication measures.

Typed names in email or PDFs do not meet this policy unless accompanied by verifiable authentication (e.g., secure login, IP tracking, or e-signature platform).

6. Recordkeeping:

- The grantee shall retain all certified payroll records (including electronic versions) for at least three (3) years after final project closeout;
- Records must be readily available for review upon request by any Federal funding agency or DOL directly;
- Payrolls may be stored electronically, provided access and integrity are maintained;

7. Oversight and Audit:

- The Grantee's Labor Compliance Officer shall review payroll submissions for accuracy and signature compliance;
- Any irregularities shall be flagged, and the contractor must be notified within 5 business days for correction;

8. Exceptions

In cases where electronic submissions do not meet the above standards, the grantee reserves the right to request original wet-signed copies or require the use of an approved digital signature tool.

9. Checklist

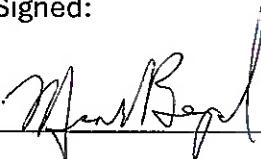
The electronic system must meet the detailed requirements established in the enclosed Checklist as **Exhibit A**.

10. Contact

For questions or technical support, please contact:

Labor Compliance Officer
SIMMERING-CORY | IOWA CODIFICATION
JUSTIN YAROSEVICH
641-355-4072 | justin@sc-ic.com

Signed:



Michael Boyd, Mayor
Chief Elected Official