

CDBG SMALL CITIES POLICY BULLETIN 2025-01



DATE: April 18, 2025
TO: CDBG Grantees and Interested Parties
FROM: Andrew Hayman, CDBG Director
RE: Electronic Signatures for Certified Payrolls

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The purpose of this Bulletin is to inform grantees and grant administrators of the requirements and best practices in securing necessary signatures for Certified Payroll submission ensuring that contractors working on CDBG projects are in compliance with HUD and US Department of Labor requirements, specifically for obtaining Electronic Signatures.

Electronic Signatures

The Department of Labor (DOL) has advised that the proper use of an electronic signature is acceptable for the purposes of the Copeland Act and its implementing regulations regarding Davis-Bacon payroll certification. That means that Davis-Bacon payroll reports may be certified and submitted electronically, i.e., via the internet. **Please be careful to distinguish that electronic signature/submission does not mean pdf files of signed payrolls attached to an email, or faxed copies of signed payrolls. These methods are comparable to photocopies and are not acceptable submissions.**

There are several vendors that offer products claiming to manage electronic payroll certification/submission/compliance/retention, etc., for the purpose of meeting Davis-Bacon/Copeland Act requirements. Several contracting agencies report using these products and find them to be acceptable for these purposes.

However, HUD client agencies, grantees and other program participants are welcome to engage electronic payroll services from vendors that offer products meeting Davis-Bacon and Copeland Act requirements.

Acceptable Vendors for Kansas CDBG Projects

Many vendors may be available on a large scale for helping organizations utilize appropriate electronic signatures. Some examples:

DocuSign
Adobe Acrobat Pro

Certification of Completion must be provided with any documents that include an electronic signature used from these vendors.

If a grantee and contractor wish to utilize the acceptable use of electronic signatures for their certified payrolls, The Labor Standards Compliance Officer will be responsible for verifying that these documents are signed utilizing an approved electronic signature vendor and each weekly payroll is accompanied by the Certification of Completion. Grantees are not required to use electronic signatures. This is an alternative to traditional ink signed documents.