



MAY 13 2009

United States
Department of
Agriculture

Food and
Nutrition
Service

3101 Park
Center Drive

Alexandria, VA
22302-1500

SUBJECT: Use of Electronic Signatures to Verify SNAP-Ed Time and Effort Reporting

TO: All Regional Administrators
Food and Nutrition Service

In fiscal year (FY) 2009, the Food and Nutrition Service (FNS) first allowed Supplemental Nutrition Assistance Program Education (SNAP-Ed) supervisors to use electronic signatures to certify time and effort reports; however, the policy for the individual SNAP-Ed providers required a hand written signature on weekly time and effort report submissions to their supervisors.

Recently, the Association of State Nutrition Network Administrators (ASNNA) requested that FNS review this policy and recommended that the use of electronic signatures for time and effort reporting be allowed for both individual SNAP-Ed providers and supervisors. FNS evaluated this request and determined that the use of electronic signatures for time and effort reporting is a viable method to reduce reporting burden for SNAP-Ed State and implementing agencies.

SNAP State agencies that opt to use electronic signatures must meet the following conditions:

- Written standard operating procedures that address the creation, maintenance, and management of records containing electronic signatures must be in place.
- Agency staff training on the guidelines and procedures for the implementation and use of electronic signatures must be documented.
- Certification procedures must be in place to ensure that the computer systems generating electronic signatures are properly maintained.
- System audit trail capabilities that track electronic signatures from the individual educator to the supervisor and then to central accounting must be in place.
- The electronic system used for generating time and effort reports that contain electronic signatures must be maintained in a secure environment protected from unauthorized access, alteration or destruction.
- Electronic system capabilities that provide verifiable user ID with password protection for each individual SNAP-Ed provider must be in place.

If a State's electronic time and effort system for SNAP-Ed meets the conditions listed above, FNS will allow the option of electronic signatures for time and effort reporting by SNAP-Ed providers using the following guidance:

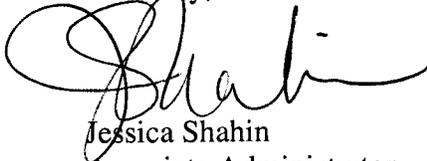
- Timesheets must be used to document actual hours worked for all staff working less than 100 percent of their time on SNAP-Ed.

- SNAP-Ed staff devoting 100 percent of their time to SNAP-Ed will continue to submit semi-annual time and effort certifications.
- Time sheets submitted to a supervisor must be electronically signed by each individual SNAP-Ed provider.
- Supervisors must continue to review and verify timesheets and coordinate any corrections needed with the individual provider.
- Supervisors can continue to submit time sheets with electronic signatures in bulk (up to 20 sheets per transmittal) to their central accounting office.

If opting to use electronic signatures for individual SNAP-Ed providers, the State must include a statement within their annual SNAP-Ed plan assuring FNS that their electronic time keeping system meets the requirements and conditions outlined in this memorandum.

Please advise your State agencies that electronic signatures are an acceptable method for submitting time and effort reports when claiming reimbursement for staff from FNS. Please contact Alice Lockett, Senior Nutritionist, at 703-305-2478 or Charles Okal, Chief, Grant Management Branch, at 703-305-2854, if you have questions.

Sincerely,



Jessica Shahin
Associate Administrator
Supplemental Nutrition Assistance Program