



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

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Alexandria, VA  
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**DATE:** June 15, 2007

**MEMO CODE:** SP 12-2007, SFSP 07-2007, CACFP 09-2007

**SUBJECT:** Electronic Record and Reporting Systems

**TO:** State Agencies  
Child Nutrition Programs  
All States

Regional Directors  
Special Nutrition Programs  
All Regions

The increasing prevalence of electronic systems of records and claiming is an encouraging step toward streamlining recordkeeping and reporting requirements. However, it is important to ensure that implementing an electronic system does not create a barrier to participation.

Child nutrition regulations at 7 CFR 210.19(e), 225.18(f) and 226.25(b), which authorize State agencies to make additional requirements, specifically stipulate that additional requirements may not be inconsistent with the regulations or deny the Program to eligible institutions, areas or participants. State agencies and institutions are encouraged to establish internet or electronic based systems, including but not limited to, application submissions and claims processing; however, any such system must include a means to fully access Program benefits without internet or computer access. Otherwise, an eligible institution or individual might be denied access to Program benefits.

In cases where participating institutions are unable or unwilling to implement electronic based systems, it may not be reasonable to expect that State agencies will be able to provide the same level of service that users of electronic systems receive. Nevertheless States must still meet all regulatory requirements. For example, CACFP claims must be paid within 45 days.

If you have any questions regarding this issue, Regional Offices should contact Keith Churchill at 703-305-2947 or Bill Wagoner at 703-305-2837. State agencies should contact their Regional Office representatives.

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