



<b>Claiming Deadlines for Child Nutrition Programs</b>			
<b>Program:</b> CACFP NSLP SFSP	<b>Date Approved:</b> 8/7/2015	<b>Approved by:</b> Becky Bessette	<b>Date Reviewed/Revised:</b> 7/3/19 <b>Date Distributed:</b>
<b>PURPOSE:</b>			
<ol style="list-style-type: none"> <li>1. Child Nutrition Program Sponsors are responsible for submitting claims for reimbursement in a timely manner and within the regulatory time frame. Payment will be denied if claims are submitted late. This Policy outlines the regulatory time frames for claim submission.</li> <li>2. Federal regulations governing the Program mandate that a final claim for reimbursement be submitted to RIDE not later than 60 days following the last day of the full month covered by the claim. When the 60<sup>th</sup> day falls on a Saturday, Sunday, or Federal holiday, the claim is due on the next business day.</li> <li>3. Each sponsor may be allowed a one-time only exception for the submission of a late or revised claim, which must be submitted in writing and approved by RIDE prior to payment. One-time exception requests must be accompanied by corrective action describing how the institution will rectify the circumstances resulting a late claim.</li> </ol>			
<b>PROCEDURE:</b>			
<ol style="list-style-type: none"> <li>1. <b>Program Claims Deadlines</b> <ol style="list-style-type: none"> <li><b>60 Days</b> <ol style="list-style-type: none"> <li>A. A valid claim for reimbursement, or an upward claim revision, must be submitted into CNP Connect<sup>1</sup> by the Sponsor within 60 days from the last day of the claim month.</li> </ol> </li> <li><b>Late Claims – 61 to 90 Days</b> <ol style="list-style-type: none"> <li>A. All claims or revised claims for reimbursement must be submitted within 60 calendar days from the last day of the claim month or claims cannot be paid.</li> <li>B. If a claim is submitted after the 60 calendar day period, the Sponsor may request an exception in one of two ways described below.</li> </ol> </li> </ol> </li> <li>2. <b>Exception Provision</b> <ol style="list-style-type: none"> <li><b>Circumstances Within The Sponsor’s Control</b> <ol style="list-style-type: none"> <li>A. Each Sponsor is allowed a one-time exception every 36 months for the submission of a late or revised claim that results in increased reimbursement when the lateness is due to reasons <u>within</u> the control of the Sponsor. An exception is applied to the late submission of one month’s claim. An exception will not be applied to multiple months of claims.</li> </ol> </li> </ol> </li> </ol>			

<sup>1</sup> CNP Connect is the RIDE Child Nutrition Programs’ on-line claims system.

- B. Exception requests must be submitted in writing and must include an explanation describing the events and circumstances that prevented compliance with claim submission requirements. The explanation must include each reason for the upward adjustment.
- C. In order for the Sponsor to receive this exception, the Sponsor must submit an acceptable Corrective Action Plan (CAP) to RIDE for approval. The CAP must contain the following:
  - a. Actions taken to avoid any future late claim submissions.
  - b. A statement recognizing that the a claim exception may be requested only one time every 36-month period for each Child Nutrition Program operated by the Sponsor when the circumstances leading to the exception were in the Sponsor's control.
  - c. The signature of the person who entered into the agreement with RIDE to operate the program.
- D. Upon receipt, the exception request and CAP will be reviewed by RIDE to determine whether they sufficiently addresses the reason for lateness and the actions to remedy the late submission. Once the exception request is approved, the late claim or claim revision will be processed for payment. If it is not approved, RIDE will advise you of the deficiencies which need to be addressed. RIDE may approve one-time exception requests without consulting the USDA Regional Office.
- E. Sponsors may not submit a claim for reimbursement until the time that a signed Agreement between the Sponsor and RIDE is in effect. Sponsors must renew their Agreements to participate in the federally funded Child Nutrition Programs administered by RIDE annually on October 1<sup>st</sup> of each year. Sponsors who submit claims for reimbursement outside of the required claiming deadlines due to a delay in the approval of an Agreement renewal will be required to submit a one-time exception request as described above unless they can demonstrate that the circumstances leading to the delay were beyond the Sponsor's control.

#### **Circumstances Beyond the Sponsor's Control**

- A. If the Sponsor's claim is late due to circumstances beyond its control, the sponsor may submit the claim with detailed and documented evidence in writing to RIDE. Documented evidence must describe the events and circumstances that prevented compliance with claim submission requirements. RIDE will review the Sponsor's documentation and if RIDE determines that the request warrants consideration, it will be forwarded to the USDA Regional Office for approval.
- B. The Regional Office will analyze the evidence and make the final determination as to whether the circumstances warrant payment. If USDA does not approve, the Sponsor may still request the a one-time exception as described above.
- C. For CACFP and SFSP only, a Sponsor may appeal RIDE's decision not to forward a late claim or revised claim to the USDA Regional Office for consideration. Decisions made by the USDA Regional Office may not be appealed.

#### **Adjustments from Audits or RIDE Reviews**

- A. If the Sponsor's claim was submitted on time, however, and audit or RIDE review discloses over-claims or under-claims which appear to be warranted after review of the circumstances by RIDE, the Sponsor may request a claim revision for one or more monthly claims.
- B. RIDE may approve claim revisions resulting from audits or RIDE reviews if the claim falls within three years of the current fiscal year. Any audit or review adjustments beyond the

three year time frame must be submitted to the USDA Regional Office for approval.

#### **Adjustments Initiated by RIDE**

- A. RIDE may direct a Sponsor to adjust a claim if an error or omission is identified during the claim review process.
- B. An upward adjustment may only occur if the Sponsor's original claim was submitted within the 60-day deadline AND the revision occurs in time for RIDE to meet USDA's 90-day final reporting requirements.
- C. Downward adjustments shall be made without additional approval from the USDA Regional Office, regardless of when it is determined that such adjustments are necessary.

### **3. Downward Adjustments or Adjustments Resulting in No Change in Reimbursement**

- A. Sponsors must submit revised final claims for any downward adjustments or to correct any inaccurately reported non-meal data that does not result in a change in the dollar value of the claim. RIDE will accept and process all monthly claims for reimbursement that are adjusted downward or with no change in reimbursement, regardless of the postmark date. There is no deadline for the submission of adjustments that decrease a claim for reimbursement or result in no change in reimbursement.
- B. No exception request is required for a downward adjustment or an adjustment resulting in not change in reimbursement, however, the Sponsor must submit an explanation in writing describing the circumstances that prevented compliance with claim submission requirements. This explanation must include each reason for the adjustment.
- C. Sponsors submitting repeated downward adjustments or adjustments resulting in no change in reimbursement after the 60-day claim submission deadline may be required to submit a detailed corrective action plan demonstrating the action that will be taken to ensure future compliance with claim submission requirements.

### **4. Documentation to be Retained by Sponsor**

- A. Sponsors must maintain adequate documentation to support all data reported and claimed as well as the details and reasons for all adjustments made to final claims or reports. RIDE will periodically review this documentation and perform other oversight activities to monitor and enforce Program compliance. Any data provided on claims or reports which cannot be supported by documentation will be disallowed and reimbursements already paid will be refunded to RIDE.

#### **Example**

A claim (or an upward claim adjustment) for the month of October 2014 must be submitted to RIDE no later than December 30, 2014 (60 days from the last day of the claim month) for it to be processed for payment.

If this same claim (or an upward claim adjustment) is submitted after December 30<sup>th</sup>, the sponsor would have to request an exception from RIDE before the claim can be paid by RIDE.

#### **REFERENCES:**

Part 226 – Child and Adult Care Food Program 7 CFR 226.10 (e)

Part 210 – National School Lunch Program 7 CFR 201.8 (b)(1)

Part 225 - Summer Food Service Program 7 CFR 225.9 (d)(6)