

219 North Main Street, Suite 402 Barre, VT 05641 (p) 802-479-1030 | (f) 802-479-1835

## **Claim for Reimbursement Procedure**

## **Purpose and Scope**

- The purpose of this policy is to implement Child Nutrition Programs' Claim for Reimbursement Process for AOE, Child Nutrition Programs as found at <u>7 CFR 210.8</u>, <u>7 CFR 210.8</u>, <u>7 CFR 225.9</u>. Each State Agency shall establish procedure to be followed by an institution requesting program reimbursement funds.
- 2. Included are procedures and deadlines that program sponsors and school food authorities must use to file claims for reimbursement.

## **Legal Requirements**

Laws and regulations that serve as the basis for this policy include:

- The National School Lunch Act
- The Child Nutrition Act
- 7CFR 210, 215, 220, 225, and 226

## **Implementation Requirements**

- 1. Organizations are reimbursed for eligible meals and snacks.
- 2. All original and revised claims for reimbursement must be submitted electronically for each Program using the Vermont Agency of Education (AOE), Child Nutrition Programs online claim system, VT CNP-Web.
- 3. Each user in the system shall have an independent User ID and Password and allowable rights assigned by the State Agency.
- 4. All school food authorities (SFAs), sponsors and institutions must indicate on their current organization application the individual responsible and authorized for submitting the claim(s) for reimbursement on behalf of the organization.
- 5. To be eligible for reimbursement, the organization must have a complete and approved application packet on file.
- 6. The AOE reminds SFAs, sponsors, and institutions that there is a separation of duties regarding submission of claims. The Child Nutrition Programs claiming system, <u>VT CNP-Web</u>, is an online, internet-based claiming system that includes security measures to support adequate internal controls through the segregation of duties. This separation of duties involves having more than one person involved in the completion of a task. When adequate internal controls or segregation of duties are in place, one person is prevented from having control over all aspects of a particular transaction, thereby minimizing the opportunity for errors and unintended reporting.
- 7. To receive reimbursement funds, a claim preparer for each site in the SFA or organization must submit a monthly claim for reimbursement that provides site data in sufficient detail

to justify the reimbursement claimed. The data must include, at a minimum, the number enrolled (and by type), the number of days of operation, the average daily attendance, the number of free meals, reduced-priced meals, and paid meals served; and expenditure information if required; an authorized signer or official of the SFA must certify and submit the claim in VT-CNP. (Information required varies by Program) All claims submitted must be free of errors and warnings must be reviewed by the individual submitting the claims. Specific edit checks are in place to ensure claims are valid and excessive meals are not being reported and claimed.

- 8. **Due Date:** The state agency due date for the claim for reimbursement is the 15<sup>th</sup> of the month following the last day of the month covered by the claim. *For example, the July claim is due August 15<sup>th</sup>*.
- 9. **Federal Deadline:** A final Claim for Reimbursement shall be submitted to the State agency not later than 60 days following the last day of the full month covered by the claim. If the deadline falls on a Saturday, Sunday or a Federal Holiday, the due date is the next business day.

Example: The October claim must be submitted on or before December 30<sup>th</sup>. However, if the 30<sup>th</sup> falls on a Sunday, the claim is due the next business day, December 31<sup>st</sup>.

10. **Claim Due Dates:** Final Claim Due dates for original claims and upward revisions are the 60<sup>th</sup> day following the last day of the claim month. Please note that leap year impacts the 60<sup>th</sup> claim filing day for the December and January claims for reimbursement. Claims may be submitted electronically up until 11:59pm on the 60<sup>th</sup> day. Any claims submitted after the due date (60<sup>th</sup> day) may not be processed and will not be considered for processing without the request for a claim exception per the above. However, if the deadline falls on a Saturday, Sunday or a Federal Holiday, the due date is the next business day.

Final claim due dates are as follows:

Claim Month	Final Claim Due Date
July	September 29
August	October 30
September	November 29
October	December 30
November	January 29
December	February 29 (leap year)



Claim Month	Final Claim Due Date
	March 1 (non-leap year)
January	March 31 (leap year)
	April 1 (non-leap year)
February	April 29
March	May 30
April	June 29
May	July 30
June	August 29

- 11. **Claim Revisions:** Claim revisions may be made in the system using the "Add Revision" button on the claim month details page.
  - a. Upward claim revisions, when data submitted results in the total claim increasing, are allowed when received within 60 days after the last day of the claim month.
  - b. Downward claim revisions, when data submitted results in the total claim decreasing, are allowed anytime.
  - c. All documentation of changes must be kept on file to support any claim revisions.
- 12. **Late Claims:** Claims filed after the 60-day deadline are not guaranteed payment. Requests for a Late Claim Exception must be submitted in writing to the Director of Child Nutrition Programs and approved by the Director and/or USDA. Organizations may request a claim exception once in a 36-month period or under a circumstance that is beyond control such as a fire, flood or death. Claim Exceptions are approved on a case-by-case basis.
- 13. **Request for Claim Filing Exception:** The letter requesting a claim exception submitted by the organization must include the following:
  - a. The claim month the request is for
  - b. The reason the claim was not submitted on time
  - c. The steps within corrective action plan (CAP) to ensure that the claim filing error will not occur again
  - d. The effective date that the CAP was implemented
  - e. The name of individual responsible for ensuring implementation of the correct claim filing timeframes in the future
  - f. A copy of the exception request and corrective action documentation will be saved in the electronic Claim Exception file under Child Nutrition Programs Workgroup.

- g. Claim exception information must be copied and pasted into the Internal Use Section of the online claim for those organizations that request exceptions.
- 14. **Claim Revisions for Administrative Review Findings:** Claim adjustments, or fiscal action, as result of an Administrative Review will be made by the Finance Accounting Office at the Agency of Education. Upon completion of an Administrative Review, the consultant will prepare a *Fiscal Action Memo* with the following information:
  - a. The organization subject to the fiscal action
  - b. The reason for the fiscal action
  - c. The claim month(s) affected, the reason for the adjustment
  - d. The correct claim totals for the adjustment
  - e. Request for notice from finance upon completion of the fiscal action
- 15. **Claim Processing:** Received and approved claims are processed twice per month by the accounting office at the Agency of Education. The processing of claims may vary during State Fiscal Year close out in June and July.