



POLICY MEMORANDUM

TO: All Child and Adult Care Food Program Institutions (Sponsors)
➤ Child Care Programs
➤ Adult Day Care Centers
➤ Family Child Care Sponsoring Organizations

FROM: Ohio Department of Education, Office for Child Nutrition

DATE: Issued August 25, 2005, reissued October 15, 2009, reissued October 15, 2011,
reissued October 2012, reissued September 2014, reissued December 2014,
reissued October 2016

SUBJECT: **CLAIM SUBMISSION AND EXCEPTIONS FOR LATE CLAIMS**

This memorandum states Ohio's Child and Adult Care Food Program policy for the submission of claims in a timely manner. This policy is based on the United States Department of Agriculture Federal Regulations 7 CFR226.10(4)(e).

A. SUBMISSION OF CLAIMS

1. Claims for reimbursement and claim revisions must be submitted electronically using the internet and accessing the Claims Reporting and Reimbursement System.
2. Claims for reimbursement and upward claim revisions must be submitted within 45 days following the last day of the month claimed.
3. Claims for reimbursement and upward claim revisions must be correctly submitted into Claims Reporting and Reimbursement System before 11:59 p.m. of the 45th day. A claim is correctly submitted when the words "not processed" and the actual monetary amount earned is listed when viewing on Claims Reporting and Reimbursement System in the "Child and Adult Care Food Program Center Reimbursement Claim" which shows the payments by the month for the specific fiscal year.
4. **All** sponsors must submit food and food related costs as part of the Sponsor Claim. Single site sponsors will receive an error message if costs are not submitted. Family Child Care and Multi-site sponsors must submit their Child and Adult Care Food Program funded costs as well as their non- Child and Adult Care Food Program funded costs as identified in the approved budget. If costs were not budgeted for or are in excess of what was approved, you will receive an error message. Budget revisions may be necessary throughout the year. Contact your Program Specialist for assistance.
5. The Claim Submission Due Date chart for fiscal year 2017 is also available on our website at: www.education.ohio.gov

B. CLAIM REVISIONS NOT REQUIRING AN EXCEPTION

1. Claim revisions can be submitted at any time (including past the 45-day deadline) by the institution when the number of enrollments by income category, number of meals or snacks, and/or costs reported on the revised claim results in a **downward** adjustment in the reimbursement value of the claim OR when revisions do not result in an increase in reimbursement.
2. Claim revisions (upward or downward adjustments) resulting from State Agency review findings or independent audits will be initiated by the State Agency.

C. WITHIN YOUR CONTROL EXCEPTION: ONE-TIME EXCEPTION

- 1 If the lateness of the claim or upward revision is due to circumstances within the institutions (sponsor) control, the State Agency may grant a One-Time Exception once every 36 months for each of these two program types (family child care, child/adult care)
- 2 The One-Time Exception can only apply to a single month's claim, even if more than one month's claim was late for the same reason.
- 3 Reasons/circumstances within your control is if the lateness was due to an administrative or clerical error or failure of the institution to make adequate provisions to ensure that it can meet its obligation to submit the claim before the deadline. Examples are personnel changes such as the person who normally submits the claim quit or was fired, inadequate staffing, lack of training for personnel, or time needed to gather and calculate claim. Institutions should have back-up systems in place to ensure that requirements are met. In general, reasons are within your control if a corrective action plan can be developed to ensure against reoccurrence of the lateness.
- 4 To receive a One-Time Exception, institutions must request the exception and present a corrective action plan and receive approval from the State Agency. The corrective action plan must describe the steps taken to ensure that the problem that caused the late submission has been corrected.

A corrective action plan must include:

- a. On agency letterhead, request an exception for the specific month and state reason claim/upward revision was late and actions taken to avoid repetition of the situation linked to the late submission;
 - b. Actions taken to avoid any future late claim/upward revision submission;
 - c. A statement that the institution understands that the One-Time Exception can only be granted once every 36 months and that future late claims/upward revisions within 36 months of the date of the exception will not be paid unless they are determined to be due to causes outside your control; and
 - d. The signature of the person who signed the Child and Adult Care Food Program agreement or other authorized representative of the institution.
5. All One-Time (within your control) Exception requests will be acknowledged as approved or denied. Denied requests will not be forwarded to the United States Department of Agriculture Food and Nutrition Service Regional Office. Appeal procedures will be provided.

Send all requests to the attention of your assigned Education Program Specialist at the following address:

Ohio Department of Education
25 S. Front Street, Mail Stop 303
Columbus, OH 43215

NOTE: Before requesting a within your control One-Time Exception, institutions should evaluate whether the late claim/upward revision is large enough (in relation to other monthly claims) to justify “using up” the exception for the next 36 months or whether the exception should be “saved” for possible future use.

D. OUTSIDE YOUR CONTROL EXCEPTION: EXCEPTION FOR CAUSE

1. Lateness is considered outside an institution’s control if it was due to a situation or occurrence which could not have reasonably been anticipated or provided for by the institution AND it can be shown that the situation or occurrence was a direct cause of the failure of the institutions to submit its claim by the required deadline.
2. Examples of reasons outside an institution’s control include: records were destroyed by accident or natural disaster such as flood, fire, and vandalism, computer system failure or an extended electric power outage in the building where the claims are prepared.
3. If there is more than one late claim/upward revision and there are different reasons for each, a separate request must be submitted for each cause. If multiple claims/upward revisions are late for a single reason, one request may be submitted for the multiple late claims/upward revisions.
4. To request an Outside Your Control Exception:
 - a. Institutions must submit on agency letterhead a signed (signature of the person who signed the Child and Adult Care Food Program agreement or other authorized representative of the institution) written request for an Outside Your Control Exception.
 - b. Include a detailed description of the events and circumstances that prevented the claim/upward adjustment from being submitted within the 60-day deadline.
5. The State Agency will review the Outside Your Control Exception request. If the State Agency determines that the lateness was within your control, written notice will be sent stating your request will not be submitted to the United States Department of Agriculture Food and Nutrition Service Regional Office and the institution may appeal the decision. If it is clear that the late claim/upward revision was due to circumstances beyond your control, the request will be forwarded to the United States Department of Agriculture Food and Nutrition Service Regional Office for review. Your agency will be notified in writing when a decision is reached.
6. If the United States Department of Agriculture Food and Nutrition Service Regional Office deny the Outside Your Control Exception request, the institution may request a One-Time Exception for one month’s claim if it has not received an exception in the previous 36 months.

Please keep this memo on file for quick and easy reference. A copy is also available for downloading from our website at: www.education.ohio.gov. If you have any questions regarding this memo, please contact your Program Specialist at our toll free number: 1-800-808-6325.