

# Claiming System and Required Records

The Idaho State Department of Education, Child Nutrition Programs (SDE) has established a claim process for Institutions to submit accurate and complete claims for reimbursement to SDE in the claim processing system, MyIdahoCNP.

This manual section outlines and provides guidance on:

1. [SDE Claim Processing System](#);
2. [Reimbursement Rates](#);
3. [CACFP Payments for Centers](#);
4. [Administrative Payment to Sponsoring Organization of Day Care Homes](#)
5. [Food Service Payments to Sponsoring Organizations of Day Care Homes](#)
6. [Start-Up and Expansion Payments](#);
7. [Claims Against Institutions](#);
8. [Claim Records](#);
9. [Reimbursable Meal and Snack Limits](#); and
10. [Process to Submit Monthly Reimbursement Claims](#).

## SDE Claim Processing System

---

SDE has established procedures for Institutions to properly submit claims for reimbursement. The procedures include SDE edit checks in MyIdahoCNP claiming system, including but not limited to:

1. Ensuring that payments are made only for approved meal types in the Institutions approved site or provider applications in MyIdahoCNP;
2. The number of meals for reimbursement by meal type(s) does not exceed the total enrollment for the facility *times* the number days in operation for the claiming month;
3. The number of meals for reimbursement by meal type(s) does not exceed the total attendance for the facility during the claiming month; and
4. For sites with child care licensing, a current license is in effect. This is validated in the system based on the site or provider application license effective dates.

All valid claims shall be paid within 45 calendar days of receipt. For any incomplete or incorrect claim that must be revised for payment, SDE shall notify the Institution within 15 calendar days of receipt as to why and how such claim must be revised. If SDE disallows partial or full payment for a claim for reimbursement, SDE shall notify the Institution that

submitted the claim of its right to appeal under 7 CFR 226.6(k).

### **PARTICIPATION CONTROLS**

SDE has established control procedures in the MyIdahoCNP claiming system to ensure that payment is not made for meals served to participants attending in excess of the authorized license capacity reported in the site or provider application(s) of each independent center, adult day care facility or child care facility. The license capacity and effective dates reported in the site and provider applications are validated by SDE with the facility license that is attached on the checklist in MyIdahoCNP.

### **CACFP PAYMENT PROCEDURES**

Claims for reimbursement shall report information in accordance with the financial management system established by SDE, and in sufficient detail to justify the reimbursement claimed and to enable SDE to provide the final Report of the Child and Adult Care Food Program CACFP (FNS 44) required under 7 CFR 226.7(d).

### **INSTITUTION EDIT CHECKS**

Prior to submitting its consolidated monthly claim to SDE, Institutions must perform edit checks on each facility(s) meal claim. At a minimum, the Institution's edit checks must:

1. Verify that each facility has been approved to serve the types of meals claimed;
2. Compare the number of children enrolled for care at each facility, multiplied by the number of days on which the facility is approved to serve meals, to the total number of meals claimed by the facility for that month. Discrepancies between the facility's meal claim and its enrollment must be subjected to a thorough review to determine if the claim is accurate; and
3. Compare the total number of meals claimed for reimbursement by meal type(s) to the total attendance for the facility in the claim month. If any meals claimed by meal type(s) exceed the total attendance for the facility during the claiming month, the daily attendance and meal counts for the facility(s) must be subject to a thorough review to determine if the claim is accurate.

### **REQUIRED TIME FRAME TO MAINTAIN CLAIM RECORDS**

All records to support the claim shall be retained for a period of three years after the date of submission of the final claim for the fiscal year to which they pertain, except that if audit findings have not been resolved, the records shall be retained beyond the end of the three-year period as long as may be required for the resolution of the issues raised by the audit. All accounts and records pertaining to the CACFP shall be made available, upon request, to

representatives of SDE, USDA, and the U.S. Government Accountability Office for audit or review, at a reasonable time and place determined by the SDE or USDA and provided in the records request notice.

### **MONTHLY CLAIM SUBMISSION REQUIREMENTS**

Unless otherwise approved by FNS, the Claim for Reimbursement for any month shall cover only CACFP operations for that month. A final Claim for Reimbursement shall be submitted to SDE in MyIdahoCNP claiming system not later than 60 days following the last day of the full month covered by the claim. Claims not submitted within 60 days shall not be paid with CACFP funds unless FNS determines that an exception should be granted. SDE shall promptly take corrective action with respect to any Claim for Reimbursement as determined necessary through its claim review process or otherwise. In taking such corrective action, SDE may make upward adjustments in CACFP funds claimed on claims filed within the 60-days if such adjustments are completed within 90 days of the last day of the claim month and are reflected in the final report of the Child and Adult Care Food Programs (FNS-44) for the claim month which is required under 226.7(d). Upward adjustments in CACFP funds claimed which are not reflected in the final FNS-44 for the claim month shall not be made unless authorized by FNS. Downward adjustments in CACFP funds claimed shall always be made without FNS authorization regardless of when it is determined that such adjustments are necessary.

If SDE has reason to believe that an Institution, child or adult care facility, or food service management company has engaged in unlawful acts with respect to CACFP operations, this would be a basis for non-payment of claims for reimbursement. The determination would be based on the results of audits, investigations, or other reviews and the evidence found in audits, investigations, or other reviews.

# Reimbursement Rates

---

## MEAL RATES

SDE has chosen the meal times rate payment method per 7 CFR 226.9 (c) (1) and apply this method to all Institutions participating in CACFP in Idaho. The meal time's rate payment method involves reimbursing an Institution for meals served at the assigned rate for each meal. This method entails no comparison to the costs incurred by the Institution for the meal service.

Food and Nutrition Services publish rate adjustments annually in the federal register. Federal rates are adjusted annually, on July 1, for meals and snacks served in tier I and tier II day care homes, child care centers, emergency shelters, At-risk afterschool care centers, adult day care centers and outside-school-hour care centers. Day care home rate changes are based on the series for food at home of the Consumer Price Index for All Urban Consumers published by the Department of Labor. Center rate changes are based on the series for food away from home of the Consumer Price Index for All Urban Consumers published by the Department of Labor.

Meal rate adjustment is rounded to the nearest lower cent, based on changes measured over the most recent twelve-month period the data is available. The adjustment to the rates is computed using the unrounded rate in effect for the preceding year.

The administrative payments rates for day care home sponsoring organizations is adjusted annually, on July 1, as well and the changes are based on the series for all items of the Consumer Price Index for All Urban Consumers published by the Department of Labor. The adjustment is made to the nearest dollar based on changes measured over the most recent twelve-month period that the data is available.

## RATES OF REIMBURSEMENT FOR CENTERS

Emergency shelters, At-risk afterschool care centers and Head Start/Early Head Start program reimbursement is based on the number of participant meals and snacks served multiplied by the Federal free rate.

For child care centers and outside-school-hour centers, SDE assigns rates of reimbursement more frequently than annually due to changes in enrolled participants eligibility status based on information provided in the participants family income eligibility form. In each monthly claim, child care centers and outside-school-hour centers submit the center's current number of enrolled participants by eligibility status (free, reduced-price and paid). SDE uses

the claiming percentage reimbursement method to determine the center's reimbursement. Meal reimbursement is based on a center's ratio (percentage) of the number of enrolled participants in each reimbursement category (free, reduced-price and paid) to the total of enrolled participants for care in the center during the claiming month.

In the case of an outside-school-hours care center that is not required to collect enrollment forms from each participating child, a claiming percentage is the ratio (percentage) of the number of children in each reimbursement category (free, reduced-price or paid) to the total number of children participating in the center during the claiming month. Claiming percentages does not apply to emergency shelters, At-risk afterschool care centers and Head Start/Early Head Start since all meals and snacks at these centers are reimbursed at the Federal free rate.

Annually Institutions must report for each sponsored center, eligibility information on the number of free, reduced-price, and paid enrolled participants in their October site claim for all the enrolled participants in the month of October in order to calculate a claiming percentage 7 CFR 226.9(b).

Each following month until the end of the Program year (September 30), the Institution shall continue to report the same eligibility data for each sponsored center, unless there is a change to the free, reduced-price, and paid participants enrolled in the center during the claiming month. It is recommended for Institutions to maintain a monthly enrollment eligibility roster for each center. In doing so, the center will be able to maintain an accurate count of all free, reduced-price, and paid enrolled participants and report any changes on the center's monthly claims.

In addition, the Institution must submit in the monthly claim for each sponsored center the total number of meals by meal type (breakfast, AM snack, lunch, PM snack, supper and late snack) served to eligible participants during the month on eligible participating days. Institutions may only claim meals served on days approved in the center site application packet in MyIdahoCNP.

The MyIdahoCNP claiming system will apply the applicable claiming percentage to the total number of meals, by meal type, served to participants to determine the number of meals served to free, reduced-price, and paid participants and then will multiply the applicable Federal rate. Example, if the center reported the below data in the monthly claim:

**Number of enrolled participants by reimbursement category**

Free Category: 10  
Reduced Category: 5  
Paid Category: 20  
Total Enrolled: 35

**Child Meals / Snacks Served**

Breakfast: 200

MyIdahoCNP claiming system will calculate the claiming percentage of the enrollment eligibility data reported in the claim by dividing the enrollment reported by category by the total enrollment. Each eligibility factor or percentage is then multiplied by the number of total meals reported in the claim by meal type. See below for an example:

Eligibility Category	Category/Total Enrollment	Eligibility Factor / Percentage	Total Breakfast Claimed	Breakfast Meals by Category
Free	10/35	.29 or 29%	200	<b>58</b>
Reduced-price	5/35	.14 or 14%	200	<b>28</b>
Paid	20/35	.57 or 57%	200	<b>114</b>
	Total:	1 or 100%		200

The final step, the claiming system will multiply the meal types by eligibility category by the applicable Federal meal rate to determine the reimbursement amount. See below:

Eligibility Category	Breakfast Meals by Category	Federal Meal Rate	Reimbursement Amount
Free	58	\$1.89	\$109.62
Reduced-price	28	\$1.59	\$44.52
Paid	114	\$.32	\$36.48
<b>Total:</b>	<b>200</b>		<b>\$190.62</b>

## CACFP Payments for Centers

---

Payments must be made only to Institutions operating under an agreement with SDE for the meal types specified in the center site application served at approved child care centers, At-risk afterschool care centers, adult day care centers, emergency shelters, and outside-school-hours care centers. SDE has a policy under which new Independent centers may be reimbursed for meals served in accordance with provisions of CACFP, after a preapproval visit is conducted by the state agency, in the calendar month preceding the calendar month in which the agreement is executed. Since SDE's policy permits new centers to earn reimbursement for meals served prior to the execution of a CACFP agreement with SDE, CACFP reimbursement must not be received by the center until the agreement is executed.

For sponsoring organizations of centers, new centers may be reimbursed for meals served in accordance with provisions of CACFP, after the sponsor conducts a pre-approval visit, trains the new center on CACFP requirements, executes an agreement (if unaffiliated center), and submits the site application in MyIdahoCNP and receives SDE approval.

### TIME OF SERVICE MEAL COUNTS

SDE must base reimbursement to each approved child care center and adult day care center on actual time of service meal counts of snacks or meals, by type, served to children or adult participants.

### FOR-PROFIT CENTER CLAIMS

For-profit child care centers, including for-profit At-risk and outside-school-hours care centers, must be reimbursed only for the calendar months during which at least 25 percent of the children in care (enrolled or licensed capacity, whichever is less) were eligible for free or reduced-price meals or were title XX beneficiaries. For-profit adult day care centers must be reimbursed only for the calendar months during which at least 25 percent of enrolled adult participants were beneficiaries of title XIX, title XX, or a combination of titles XIX and XX.

In submitting a claim for reimbursement, each Institution shall certify that the claim is correct and that records are available to support that claim. For each month in which independent for-profit child care centers and independent for-profit outside-school-hours care centers claim reimbursement, they must submit the number and percentage of children in care (enrolled or licensed capacity, whichever is less) that documents at least 25 percent are eligible for free or reduced-price meals or are title XX beneficiaries. **However,** children who only receive At-risk afterschool snacks and/or At-risk afterschool meals must

not be considered in determining this eligibility for the child care or outside-school-hour center.

Sponsoring organizations of for-profit child care centers or for-profit outside-school-hours care centers must submit the number and percentage of children in care (enrolled or licensed capacity, whichever is less) that documents that at least 25 percent are eligible for free or reduced-price meals or are title XX beneficiaries. Sponsoring organizations of such centers must not submit a claim for any for-profit center in which less than 25 percent of the children in care (enrolled or licensed capacity, whichever is less) during the claim month were eligible for free or reduced-price meals or were title XX beneficiaries.

Independent for-profit adult day care centers shall submit the percentages of enrolled adult participants receiving title XIX or title XX benefits for the month claimed for months in which not less than 25 percent of enrolled adult participants were title XIX or title XX beneficiaries.

Sponsoring organizations of such adult day care centers shall submit the percentage of enrolled adult participants receiving title XIX or title XX benefits for each center for the claim. Sponsoring organizations of such centers shall not submit claims for adult day care centers in which less than 25 per cent of enrolled adult participants were title XIX or title XX beneficiaries for the month claimed.

## **USDA FOODS**

SDE requires new Institutions to state their preference to receive commodities (USDA Foods) or cash-in-lieu of commodities when they apply. Annually, SDE will provide Institutions with information on foods available in plentiful supply, based on information provided by the USDA. If any Institutions elect to receive USDA Foods, SDE will submit annually the list of Institutions by June 1 to Idaho USDA Food distribution agency, unless FNS approved a request for cash-in-lieu of commodities for all Institutions. The list shall be accompanied by information on the average daily number of lunches and suppers to be served to participants by each Institution.

## **CASH-IN-LIEU**

Cash-in-lieu are cash payments in lieu of commodity (USDA Food) assistance provided to States for CACFP Institutions. These payments are calculated by multiplying the number of eligible, reported lunches and suppers for the claim month by the current USDA Food entitlement rate. Currently Idaho has elected to pay all CACFP Institutions CIL in place of USDA Foods. SDE, in consultation with the Idaho USDA distribution team, has demonstrated

to FNS that distribution of commodities to CACFP, with the number and size of Institutions would be impracticable for Idaho. In addition, the case size for commodity products is a larger volume than the facilities in Idaho may use and store in a reasonable time. Annually the SDE may request for cash-in-lieu of all commodities by submitting to FNS not later than May 1.

### **LIMITS ON REIMBURSEMENTS**

Total CACFP payments to an Institution during any fiscal year, including any cash payments in lieu of commodities, shall not exceed allowable CACFP operating and administrative costs, less income to CACFP. SDE may limit payments for administrative costs to the amount approved in the annual administrative budget of the Institution. In addition, SDE will prohibit an Institution from using payments for facility operating costs to pay for administrative expenses.

# Administrative Payments to Sponsoring Organizations for Day Care Homes

---

Sponsoring organizations for day care homes shall receive payments for administrative costs. During any fiscal year, administrative costs payments to a sponsoring organization may not exceed the lesser of:

1. Actual expenditures for the costs of administering the CACFP less income to the CACFP, or
2. The amount of administrative costs approved by SDE in the sponsoring organization's budget, or
3. The sum of the products obtained by multiplying each month the sponsoring organization's number of family and group day care homes submitting a claim for reimbursement during the month by the appropriate Federal administrative reimbursement rate. In short, this method is referred to as homes times' rate. Sponsoring organizations of day care homes remain responsible for correctly accounting for costs and for maintaining records and sufficient supporting documentation to demonstrate the administrative costs claimed that have been incurred, are allowable and allocable to CACFP, and comply with applicable CACFP regulations and policies.

During any fiscal year, administrative payments to a sponsoring organization may not exceed 30 percent of the total amount of administrative payments and food service payments for day care home operations.

Sponsoring organizations of day care homes with administrative funds remaining unspent at the end of the fiscal year (FY) may carry over up to 10 percent of their administrative reimbursement to the next FY. Any remaining funds over the 10 percent limit must be returned to SDE and SDE will report and return the funds over the allowed 10% to USDA.

# Food Service Payments to Sponsoring Organizations for Day Care Homes

---

Payments shall be made only to sponsoring organizations operating under an agreement with SDE for the meal types specified in each provider application served to enrolled non-resident children and eligible enrolled children of day care home providers, at approved day care homes. SDE must base reimbursement to each approved day care home on daily meal counts recorded by the provider by the end of day.

Each sponsoring organization shall report each month to SDE the total number of meals by type (breakfasts, lunches, suppers, and snacks) and by category (tier I and tier II), served to children enrolled in approved day care homes. Prior to submitting its consolidated monthly claim to SDE, each sponsoring organization must conduct reasonable edit checks on the day care homes' meal claims which, at a minimum, include those edit checks specified in 7 CFR 226.10(c) and provided earlier in the manual section for Institutions.

Each sponsoring organization shall receive payment for meals served to children enrolled in approved day care homes at the tier I and tier II reimbursement rates, as applicable based on daily meal counts taken in the home by the end of the day, and as established by law and adjusted in accordance with 7 CFR 226.4.

For tier I day care homes, the full amount of food service payments shall be disbursed to each day care home on the basis of the number of meals served, by type, to enrolled children. For tier II day care homes, the full amount of food service payments shall be disbursed to each day care home on the basis of the number of meals served to enrolled children by meal type, and by category (tier I and tier II).

As applicable, each sponsoring organization of day care homes shall:

1. Require that tier I day care homes submit the number of meals served, by type, to enrolled children by child;
2. Require that tier II day care homes in which the provider elects not to have the sponsoring organization identify enrolled children who are eligible for free or reduced-price meals submit the number of meals served, by type, to enrolled children by child; and
3. Annually sponsoring organizations, if requested by the provider, must identify enrolled children who are eligible for free or reduced-price meals. In such homes, the sponsoring organization must require those day care homes to submit the number and types of meals served each day to each enrolled child by name. The sponsoring

organization shall use the information submitted by the homes to produce an actual count, by type and by category; Tier High (tier I) and Tier Low (tier II), of meals served in the homes.

## Start-up and Expansion Payments

---

SDE has established procedures for evaluating requests for start-up and expansion payments, issuing these payments to eligible sponsoring organizations, and monitoring the use of these payments.

Prospective sponsoring organizations of day care homes, participating sponsoring organizations of child care centers or outside-school-hours care centers, independent centers, and participating sponsoring organizations of less than 50 homes that meet the application criteria shall receive start-up payments to develop or expand successful CACFP operations in day care homes.

Participating sponsoring organizations of day care homes that meet the application criteria shall receive expansion payments to initiate or expand CACFP operations in day care homes in low-income or rural areas.

SDE shall approve start-up payments only once for any eligible sponsoring organization, but may approve expansion payments for any eligible sponsoring organization more than once, provided that:

1. The request must be for expansion into an area(s) other than that specified in their initial or prior request; and
2. 12 months have elapsed since the sponsoring organization satisfied all obligations under its initial or prior expansion agreement.

Eligible sponsoring organizations which have received start-up payments shall be eligible to apply for expansion payments at a date no earlier than 12 months after it has satisfied all its obligations under its start-up agreement with SDE.

Sponsoring organizations which apply for start-up or expansion payments shall provide the following:

1. Public status or tax-exempt status under the Internal Revenue Code of 1986;
2. An organizational history of managing funds and ongoing activities (i.e., administering public or private programs);
3. An acceptable and realistic plan for recruiting day care homes to participate in the CACFP (such as the method of contacting providers), which may be based on estimates of the number of day care homes to be recruited and information supporting their existence, and in the case of sponsoring organizations applying for expansion payments, documentation that the day care homes to be recruited are

located in low-income or rural areas; and

4. An acceptable preliminary sponsoring organization management plan including, but not limited to, plans for preoperational visits and training.

SDE shall deny start-up and expansion payments to a sponsoring organizations which fails to meet the requirements above or which have not been financially responsible in the operation of other CACFPs funded by Federal, State, or local governments. SDE shall notify the sponsoring organization of the reasons for denial and allow the sponsoring organization full opportunity to submit evidence on appeal as provided for in 7 CFR 226.6(k).

Any sponsoring organization applying for start-up or expansion funds shall be notified of approval or disapproval by SDE in writing within 30 calendar days of filing a complete and correct application. If a sponsoring organization submits an incomplete application, the SDE shall notify the sponsoring organization within 15 calendar days of receipt of the application and shall provide technical assistance, if necessary, to the sponsoring organization for the purpose of completing its application.

Sponsoring organizations which apply for and meet the criteria for start-up or expansion payments shall enter into an agreement with SDE. The agreement shall specify:

1. Activities which the sponsoring organization will undertake to initiate or expand CACFP operations in day care homes;
2. The amount of start-up or expansion payments to be issued to the sponsoring organization, together with an administrative budget detailing the costs which the sponsoring organization shall incur, document, and claim;
3. The time allotted to the sponsoring organization for the initiation or expansion of CACFP operations in family day care homes; and
4. The responsibility of the applicant sponsoring organization to repay, upon demand by SDE, start-up or expansion payments not expended in accordance with the agreement.

Upon execution of the agreement, SDE shall issue a start-up or expansion payment to the sponsoring organization in an amount equal to not less than one, but not more than two month's anticipated administrative reimbursement to the sponsoring organization as determined by SDE. However, no sponsoring organization may receive start-up or expansion payments for more than 50-day care homes. Eligible sponsoring organizations with fewer than 50 homes under their jurisdiction at the time of application for start-up payments may receive such payments for up to 50 homes, less the number of homes under their jurisdiction. Eligible sponsoring organizations applying for expansion funds may receive at a

maximum such payments for up to 50 homes at the currently assigned Federal administrative payment for the first 50 homes. In determining the amount of start-up or expansion payments to be made to a sponsoring organization, SDE shall consider the anticipated level of start-up or expansion costs to be incurred by the sponsoring organization and alternate sources of funds available to the sponsoring organization.

Upon expiration of the time allotted to the sponsoring organization for initiating or expanding CACFP operations in day care homes, SDE shall obtain and review documentation of activities performed and costs incurred by the sponsoring organization under the terms of the start-up or expansion agreement. If the sponsoring organization has not made every reasonable effort to carry out the activities specified in the agreement, SDE shall demand repayment of all or part of the payment. The sponsoring organization may retain start-up or expansion payments for all day care homes which initiate CACFP operations. However, no sponsoring organization may retain any start-up or expansion payments in excess of its actual costs for the expenditures specified in the agreement.

#### **RECOVERY OF OVERPAYMENTS**

SDE will follow the established procedures in FNS 420-1 for managing debts to recover outstanding start-up and expansion payments from Institutions which, in the opinion of SDE, the Institution will not be able to earn these payments. Once SDE determines there are outstanding start-up and expansion payments, the SDE will issue a demand for payment notice to the Institution to recover the outstanding payments from the Institution.

#### **ADVANCE PAYMENTS**

SDE has elected not to issue advance payments to all the participating Institutions in Idaho.

## Claims Against Institutions

---

SDE shall disallow any portion of a claim for reimbursement and recover any payment to an Institution not properly payable. SDE may consider claims for reimbursement not properly payable if an Institution does not comply with the recordkeeping requirements. SDE does not permit Institutions to pay over claims over a period of one or more years. SDE will allow current participating Institutions to pay the over claim from the next claim(s). If an Institution terminates their agreement with SDE during the time of the over claim determination, SDE will recover the over claim by a direct payment (check) from the Institution. However, SDE must assess interest beginning with the date stipulated in SDE's demand letter, or 30 days after the date of the demand letter, whichever date is later. Further, when an Institution requests and is granted an Administrative Review (appeal) of SDE's overpayment demand, SDE is prohibited from taking action to collect or offset the overpayment until the Administrative Review (appeal) is concluded. SDE maintains searchable records of funds recovery activities in MyIdahoCNP claims and compliance module.

In the event that the SDE finds that an Institution which prepares its own meals is failing to meet the meal requirements of 7 CFR 226.20, the SDE will record the finding and the number of meals disallowed but may choose to not disallow payment or collect an overpayment arising out of such failure if the Institution takes immediate actions to correct the findings and in the opinion of the SDE, will have a corrective effect. This may only occur when the finding is determined in the following situations:

1. New Institution pre-approval visit or for a new sponsoring organization of five or more facilities, the first 90-day review; and
2. First review during new meal pattern implementation period and only for new meal pattern requirements.

However, the SDE shall not disregard any overpayments or waive collection action arising from the findings of Federal audits.

If SDE determines that a sponsoring organization of centers has spent more than 15 percent of its meal reimbursements for a budget year for administrative costs (or more than any higher limit established pursuant to a waiver granted under 7 CFR 226.7(g)), SDE must take appropriate fiscal action. In addition, except with approval from the WRO, SDE shall consider claims for reimbursement not payable when an Institution fails to comply with the recordkeeping requirements that pertain to records directly supporting claims for reimbursement. Records that directly support claims for reimbursement include, but are not limited to; daily meal counts, menu records, enrollment records, eligibility and attendance

records, as required by 7 CFR 226.15(e).

SDE shall assert over claims against any sponsoring organization of day care homes which misclassifies a day care home as a tier I day care home unless the misclassification is determined to be inadvertent under guidance issued by FNS. However, SDE shall notify the Institution of the reasons for any disallowance or demand for repayment, and allow the Institution full opportunity to submit evidence on appeal as provided for in 7 CFR 226.6(k).

SDE collection procedures for unearned payments include:

1. Written demand for repayment notice (fiscal action notice). This initial notice of findings and the over claim includes the appeal procedures. The over claim payment date is set by SDE to include the time for requesting an appeal (15 days), 5 days for receipt of notice plus 30 days, for no more than 50 days from the date of the notice. The noticed is issued via email delivery receipt and may also be issued certified mail;
2. After the appeal process, if requested, has concluded the funds recovery will precede. For participating Institutions SDE will revise the claim as validated and collect the overclaim from the next claim;
3. If, after 30 calendar days, the Institution fails to remit full payment or the full over claim cannot be collected from claims within the date established by SDE in the initial demand for payment notice, SDE will issue a second written demand for the return of improper payments via certified mail. SDE will assess interest from the due date stipulated in the initial demand for payment notice and report the interest in the second notice. If the full payment is not provided by the due date in the initial notice, the interest must be paid directly to SDE since it cannot be recovered from future claims; and
4. If after 60 calendar days, the Institution fails to remit full payment or agree to a satisfactory repayment schedule, SDE shall refer the claim against the Institution to the Idaho State Department of Education, Deputy Attorney General (DAG) for pursuit of legal remedies.

If FNS does not concur with the SDE action in paying an Institution or in failing to collect an overpayment, FNS shall notify the SDE of its intention to assert a claim against the SDE. In all such cases, the SDE shall have full opportunity to submit evidence concerning the action taken. The SDE shall be liable to FNS for failure to collect an overpayment, unless FNS determines that the SDE has conformed with the above requirements in issuing the payment and has exerted reasonable efforts to recover the improper payment.

# Claim Records

---

Each Institution shall maintain records as prescribed by SDE's financial management system. (Electronic or hard copy in Idaho) for three years plus the current CACFP year.

## **ELECTRONIC OR HARD COPY RECORD MAINTENANCE**

The SDE encourages Institutions to maintain records electronically. The electronic records must be available to SDE and be legible in the electronic format. If the records are not legible, SDE will require hard copies during the CACFP review.

## **ELECTRONIC SIGNATURES**

The SDE allows Institutions to collect electronic signatures if the Institution maintains an electronic signature policy/procedure and uses a certification statement for each signature.

## **SOURCE DOCUMENT MAINTENANCE**

226.14(a), "...State agencies shall consider claims for reimbursement not payable when an Institution fails to comply with the recordkeeping requirements that pertain to records directly supporting claims for reimbursement. Records that directly support claims for reimbursement *include, but are not limited to*, daily meal counts, menu records, and enrollments and attendance records, as required by 226.15(e)." Under recordkeeping requirements at 226.15(e), it states "each Institution shall establish procedures to collect and maintain all program records required under this part, *as well as any records required by the State agency.*"

Idaho specifically defines valid records of time of service meal counts are *only* source documents (e.g., paper forms completed at the actual time of meal service) and that such source documentation must be retained for validating claims for reimbursement regardless of later entry into an automated system.

Records must be maintained by each Institution to support the claim for reimbursement. These include, but are not limited to:

1. Enrollment records for participants in care;
2. Indication of participants eligibility:
  - a. Income eligibility forms;
  - b. Direct Certification Match Reports and any other free eligibility supporting records; and
  - c. ICCP Certification (Tier II homes only)
3. Center monthly enrollment and eligibility roster;

4. Daily attendance records;
5. Daily meal count records; and
6. Meal pattern compliance records

## ENROLLMENT RECORDS

Except for outside-school-hours care centers, emergency shelters, and At-risk afterschool care centers, Institutions and facilities must maintain annually updated enrollment documentation for all participants claimed for meal reimbursement. All participants, including drop-ins must be enrolled for care. Documentation of enrollment must be updated annually, signed by a parent or legal guardian, and include information on each child's normal days and hours of care and the meals normally received while in care.

SDE recommends that Institutions use their center or home enrollment form and add any required CACFP enrollment information that is not currently on their form; for example, normal days, hours and meals received while in care. If the Institution chooses not to use their enrollment form for the annual updates, SDE has two enrollment form options available in MyIdahoCNP under download forms; Child Enrollment Form or the Income Eligibility Form has a section for enrollment information. Please see samples below and on the next page:

### CHILD ENROLLMENT FORM

This form must be updated annually

Child Care Center or Provider Name									
NAME OF CHILD <small>Last, First PLEASE PRINT</small>	BIRTH DATE <small>(Mo/Day/Yr)</small>	NORMAL HOURS IN CARE		NORMAL MEALS WHILE IN CARE					
		From	To	BKFST	AM SNACK	LUNCH	PM SNACK	SUPPER	LATE SNACK
	/ /	am/pm	am/pm						
	/ /	am/pm	am/pm						
	/ /	am/pm	am/pm						

Days in care on a normal week (circle): Sun. Mon. Tue. Wed. Thur. Fri. Sat.

I understand my child/children will receive meals at no extra charge to me when they are in care during any of the scheduled meal services.

Parent Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Parent(s) Name(s): \_\_\_\_\_

Parent Address \_\_\_\_\_

Home Phone Number: (\_\_\_\_) \_\_\_\_\_ Work Phone Numbers: (\_\_\_\_) \_\_\_\_\_ (\_\_\_\_) \_\_\_\_\_



## INCOME ELIGIBILITY FORMS AND DIRECT CERTIFICATION MATCH REPORTS

Institutions must maintain annually updated Income Eligibility forms or Direct Certification Match Reports for all participants claimed in the free or reduced-price categories. For more information on these records please see the Income Eligibility Forms section of this manual.

## CENTER MONTHLY ENROLLMENT AND ELIGIBILITY ROSTER

The Monthly Enrollment Eligibility Roster lists all enrolled participants during the month in the center and their eligibility category (free, reduced-price or paid). The Monthly Enrollment Eligibility Roster must include all center participants, including drop-ins, who are enrolled any time during the month.

Infants: child care centers that have infants in care during the month must include them on the Monthly Enrollment Eligibility Roster.

### Required Records to Develop the Monthly Enrollment Eligibility Roster:

1. Monthly Enrollment Eligibility Roster. The form captures all enrolled participant's full names and eligibility category (free, reduced-price or paid) for the month;
2. Direct Certification Match Reports;
3. Complete Income Eligibility Forms (IEF), signed, approved, and dated;
4. Any other supporting document for a participant's eligibility;
5. Enrollment forms for each participant enrolled in the center during the month.

### Creating and Maintaining a Monthly Enrollment Eligibility Roster

1. Add the full name of each currently enrolled participant to the Monthly Enrollment Eligibility Roster;
2. Mark the appropriate eligibility category box for each participant on the Monthly Enrollment Eligibility Roster (free, reduced-price, or paid);
3. Mark participants who were not directly certified or who do not have a complete, accurate, or approved IEF in the Paid category.
4. Double-check the Monthly Enrollment Eligibility Roster for accuracy.
5. Using the Monthly Enrollment Eligibility Roster for the current claiming month, total the number of participants in each of the three eligibility categories;
6. Double-check the total numbers for accuracy;
7. Report the numbers tallied for each category, Free, Reduced-Price and Paid, on the current month's reimbursement claim in MyIdahoCNP under "Free, Reduced-Price and Paid."

8. Each month update the previous month's Monthly Enrollment Eligibility Roster by adding new enrolled participants and their eligibility category, removing participants that were not enrolled in the entire month and their eligibility status; and
9. Repeating steps 4-7.

#### For-profit Institutions Requirement to Determine Site Eligibility Monthly

For-profit Institutions may qualify for CACFP reimbursement in a given month if 25% of the site's currently participating enrollment or 25% of its licensed capacity, whichever is the lesser, is eligible for free or reduced-price meals in that month. Institutions should develop a process similar to the following one to determine 25% eligibility for each site every month prior to submitting a claim for meal reimbursement to SDE.

To get the percentage of free and reduced-price participants at the site, total the number of children who are free and reduced-price eligible and divide that number by the total number of children listed on the enrollment roster or the licensed capacity, whichever is the lesser of the two.

If the site has greater than or equal to 25% free and reduced-price eligible participants during the month, the site qualifies for CACFP meal reimbursement in that month. Sites included in the reimbursement claim must reach or exceed the 25% eligibility. An Institution may not round up when determining the 25% eligibility. For example; in a month where a site with only 24.9% of its currently participating enrollment or licensed capacity, whichever is the lesser, is eligible for free and/or reduced-price, the Institution is not eligible for meal reimbursement for that month.

When a for-profit Institution submits a monthly claim for reimbursement it is certifying that all sites included in the claim meet the 25% eligibility requirement.

For-profit Institutions must maintain records documenting that they meet the 25% qualifying standard for each site every month CACFP reimbursement is claimed for the site. This documentation would include all Monthly Enrollment Eligibility Rosters and all supporting documents for the rosters. For-profit Institutions receiving Federal funds may be required by the SDE to have periodic claim audits.

Below is an example of a monthly enrollment eligibility form available for Institutions to use in MyIdahoCNP download forms.

Child and Adult Care Food Program  
Monthly Eligibility Roster

Month: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Site Name:					Date Eligibility Approved	Date Enrollment Signed by Parent
Claiming Categories						
No.	Childs Full Name	Free	Reduced	Paid		
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						

## Common Errors with the Center Monthly Enrollment Eligibility Roster

During Program reviews, SDE will verify the center Monthly Enrollment Eligibility Roster by reviewing the center's enrollment records, direct certification matches, and income eligibility forms. The following are some errors that will require SDE to adjust the Monthly Enrollment Eligibility Roster, which may affect the claiming percentages and the amount of reimbursement;

1. Counting a participant who was not enrolled in the center on the roster;
2. Not counting all participants (including infants) who were enrolled in the month on the roster;
3. Not having a completed and approved IEF or other free-eligible documentation for each participant counted in the Free or Reduced-Price categories;
4. Using an IEF that was signed by the adult household member or determining official more than 12 months prior;
5. Incorrectly recording the eligibility category on the IEF or on the roster; and
6. Incorrectly adding the number of participants in any of the eligibility categories.

## DAILY ATTENDANCE RECORDS

Institutions and facilities must maintain daily attendance records indicating the number of participants in attendance. Idaho's licensing agency requires all child care centers and homes to maintain daily time in and out attendance records for each enrolled child. SDE and sponsoring organizations will use this documentation to verify claims monthly.

Head Start programs may record attendance as present/absent for part-day classrooms, which have a distinct beginning and ending time, in this situation arrival and departure times are not routinely required. A record of each participant's present/absent is sufficient. Any participant's deviations from the normal school day, such as late arrivals and early departures, must be recorded with in/out times.

Daily attendance records must document each participant's first and last name, or have another SDE approved code for identifying each participant. Any participant who is enrolled and attends for any part of the day is considered to be in attendance. Attendance records are used to support monthly meal counts per participant. When applicable, attendance records are used to verify the Monthly Enrollment and Eligibility Roster during a Program review by SDE and to ensure a site is meeting licensing requirements.

Attendance records must show the actual time participants arrive and depart. These times are usually recorded by a parent/guardian, adult participant, or facility employee.

Participants who arrive and depart more than once during the day (for example, school age

children in care at the center before and after school) must have both arrival times and both departure times recorded.

Institutions must have a system to record accurate attendance times when parents, guardians, or adult participants forget to record the participant’s time in and time out. The time in and out should be recorded when the participant arrives or departs from the facility.

Institutions may want to:

1. Place a clock and calendar by the attendance sheet so parents, guardians or adult participants can easily record arrival and departure times; and
2. Educate parents and adult participants on the importance of recording participants in and out times every day. The SDE recommends using one form per day for recording arrival and departure times. With this method, parents/guardians or adult participants cannot mistakenly record attendance on the wrong day. Institutions may also use a software system for attendance records.

SDE has two attendance forms available for centers and one meal count/attendance record available for homes. Institutions may create their own attendance form. The Institution must submit it for approval to SDE before implementing. All sample attendance forms from SDE are available in MyIdahoCNP under download forms and shown below.

***Center Attendance Record Sample by Center or Classroom in Center***

**Sample Daily Time In & Out Sheet**

**Name of Center/Classroom:** \_\_\_\_\_

**Date:** \_\_\_\_\_

	Childs Name (First, Last)	Time In	Time Out	Time In	Time Out	Time In	Time Out
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

*Center Attendance Record Sample by Child*

**Sample Daily Time In & Out Sheet**

Name of Center/Classroom: \_\_\_\_\_

Child's Name : \_\_\_\_\_

Month/Year: \_\_\_\_\_

Month Date	Time In	Time Out	Time In	Time Out	Time In	Time Out
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

*Day Care Home Sample Meal Count and Attendance Record*

Provider Name \_\_\_\_\_

Month of \_\_\_\_\_

**A** - Arrival time of Child  
**D** - Departure time of Child

CHILD NAME		1	2	3	4	5	6	7	8	9	10	11	12
AGE _____	<b>A</b>												
	<b>D</b>												
	B												
	SN												
	L												
	SN												
	S												
	LS												
AGE _____	<b>A</b>												
	<b>D</b>												
	B												
	SN												
	L												
	SN												
	S												
	LS												

## **DAILY MEAL COUNT RECORDS**

Institutions and facilities must maintain daily meal counts records. Family day care homes must maintain daily meal counts, by type (breakfast, lunch, supper, and snacks), served to participants. Centers must maintain time of service meal counts, by type (breakfast, lunch, supper, and snacks), served to center participants. For more information on meal count records please refer to the Meal Service Requirements section in the CACFP manual.

## **MEAL PATTERN COMPLIANCE RECORDS**

Meal pattern menu compliance records must be maintained by Institutions and facilities to support all meals and snacks claimed for reimbursement met the meal pattern requirements. For more information on the meal pattern compliance records please review the Menu Planning and Menu Records requirement section in the CACFP manual.

## Reimbursable Meal and Snack Limits

---

In general, independent centers and sponsoring organizations of centers may be reimbursed for a maximum of either two meals and one snack or two snacks and one meal per participant per day.

At-risk afterschool centers may be reimbursed for a maximum of one snack and one meal per participant per day.

Emergency shelters may be reimbursed for a maximum of any three meals per participant per day.

Institutions may claim reimbursement only for those meal types (breakfast, lunch, supper, snacks) that are approved by SDE on the current site or provider application in MyIdahoCNP. For instance, if an Institution was approved to claim snack and lunch only, the Institution may not claim breakfast even if it was served.

### **BEFORE CLAIMING MEALS AND SNACKS**

Institutions shall have edit check procedures in place to verify claim records before submitting the claim for reimbursement to ensure the Institution will submit an accurate claim. Institutions shall review attendance and enrollment records to meal counts. Meals may not be claimed for reimbursement for participants that are not recorded in attendance or enrolled in the facility. The only exception to enrollment is for outside-school-hour centers, emergency shelters or At-risk afterschool centers where enrollment records are not required. Note, for children enrolled in child care centers that also participate in an At-risk afterschool program in the center, enrollment is required.

In addition, the Institution must review completed daily menu records and supporting menu records to ensure each meal and snack served met the menu pattern requirements. The Institution shall not claim any meals or snacks that did not meet the meal pattern requirements.

Finally, the Institution must verify enrollment eligibility data for centers and ensure the data is accurate for the claiming month. For sponsoring organizations of day care homes, the Institution must verify each provider is claimed at the correct tiering status.

## Process to Submit Monthly Reimbursement Claims

---

SDE has a web-based meal reimbursement system called “MyIdahoCNP.” To be reimbursed for meals and snacks served, Institutions must complete and submit an on-line Reimbursement Claim Form to SDE each month. Institutions are required to submit claims by center site or provider in the system.

To submit claims on-line, individual users must have a secure user ID and password to access the on-line claiming system. The user ID and password are assigned when the Institution submits a User Authorization Form during the application packet approval process or when new employees are hired that have responsibilities in the Institution to maintain information in the claiming or application system. The user ID and password are equivalent to an original signature on a paper claim for purposes of official documentation. When using the user ID and password, the user is certifying the information transmitted electronically is complete and accurate. It is important users do not share their login ID or password and keep it confidential.

The deadline for submitting a claim is 60 days following the end of the claim month. The official submission date of a claim is the date the claim was submitted on-line.

The SDE recommends Institutions submit original claims by the 10th of the month following the claim month.

Institutions need the following records per facility to complete the reimbursement claim:

1. Attendance records for the claim month;
2. Meal count records for the claim month;
3. Number of claiming days in the month (number of operating days);
4. Total daily attendance for the month (total attendance);
5. Number of free, reduced-price or paid participants for the month (centers);
6. Total number of meals served per meal type (breakfast, lunch, supper, and snack);
7. Total number of meals served per meal type and per Tier II High and Tier II Low for Tier II day care homes.

When submitting the claim, the Institution submits the claim for a claim month, for example, March 1- March 31. Institutions that operate in more than one CACFP program must maintain meal count records separately for each facility. Example: A center may operate as a child care center but during the school year offers an afterschool meal program and operates the At-risk afterschool meal program for the school age children afterschool and on

holidays during the school year. In MyIdahoCNP, when the Institution reports meals served per meal type (breakfast, lunch, supper, and snack), the meals served in the child care center will be reported separately from the meals reported for the At-risk afterschool program.

### ATTENDANCE REPORTING IN THE CLAIM FOR REIMBURSEMENT

In each separate CACFP category (Child Care, Head Start, After School At-Risk, etc.) the Institution adds together the total daily attendance for every day the site was open and serving meals or snacks for that category. In the claim enter the total number of days in operation for the site under “Total Days of Operation”. For total attendance, enter the sum of each day’s total attendance for the site by category in the claim month under “Total Attendance”.

The following is an example of a sample worksheet for calculating total daily attendance.

Date	Daily Attendance
January 3	25
January 4	30
January 5	35
January 6	28
January 9	27
January 10	36
January 11	42
January 12	23
January 13	21
January 16	38
January 17	36
January 18	45
January 19	29
January 20	33
January 23	41
January 24	38
January 25	40
January 26	31
January 27	22
January 30	35
January 31	25
<b>TOTAL ATTENDANCE</b>	<b>680</b>

## CAPACITY FOR CLAIMED SITES

All licensed facilities will already have their licensed capacity that was established from the Idaho licensing agency, listed in the site or provider application. The licensed capacity will automatically populate in MyIdahoCNP claims for all licensed facilities, so facilities will not need to enter this information in each month's claims. Note: If the license is expired the Institution will not be able to submit a claim for the facility until the Institution revises the site or provider application, the new license is provided on the checklist and the application is submitted and approved by SDE. To finish submitting the claim the Institution will need to save the claim in the system, first to remove the error and then the claim will be ready for submittal.

## SUBMIT CLAIM FOR REIMBURSEMENT

When submitting claims on-line, the Institution must first double check to ensure all pertinent information is entered on the claim. Then the Institution follows the on-line reimbursement claim instructions for submitting the claim.

When errors have been made in the original claim submitted, Institutions may submit a revision to that claim. For revised claims, SDE may make upward adjustments in reimbursement on claims filed within the 60 day deadline if such adjustments are completed within 90 days of the last day of the claim month. Revised claims for a downward adjustment may be submitted at any time.

When submitting a revised claim on-line, the Institution must submit all required information including the new totals for the claim month, not only the correction. For example, if an Institution originally claimed 100 lunches and should have claimed 115 lunches, the Institution may submit a revised claim within the allowable timeline. When submitting a revised on-line claim, select "Revised". In the example above the Institution would submit the correct meal count totals which was 115 lunches. The claiming system will only pay the difference between the original claim and the revised claim.

## LATE CLAIMS

Claims received after 60 days from the claim month will not be paid unless a once in a three year exception request has been submitted and granted. Requests must include the reason the request is being made and steps the Institution has implemented to eliminate the problem in the future.

### **ONCE IN THREE YEAR EXCEPTION REQUEST**

The once in three year exception request must be approved by SDE and is allowed when the Institution did not submit the claim during the 60-day limit. Each Institution is allowed a one-time exception once every 36 months of CACFP operation.

### **FINAL DUE DATES**

The SDE requests that Institutions submit their monthly reimbursement claim by the 10th of the month following the claim month. The final due dates for submitting a reimbursement claim for each month, are in MyIdahoCNP under download forms.