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DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF PUBLIC AND BEHAVIORAL HEALTH

BUREAU OF BEHAVIORAL HEALTH WELLNESS AND PREVENTION

Request for Reimbursement Policy

Management Memorandum 20-001

DATE: December 9, 2019

TO: All Bureau of Behavioral Health Wellness and Prevention Funded Subrecipients and Contractors

FROM: Brook Adie, Bureau Chief *BA*

SUBJECT: Policy and Procedures for Submitting Requests for Reimbursement (RFR)

The Division of Public and Behavioral Health (DPBH), Bureau of Behavioral Health Wellness and Prevention (BBHWP) is announcing a revision in policy and procedures for subrecipients and contractors to request reimbursement (RFR) from the BBHWP. This Management Memorandum will replace Management Memorandum 17-005 and Management Memorandum 18-001. Effective immediately, all RFRs will be uploaded to the BBHWP's secured file transfer protocol (SFTP) site, Globalscape and an email sent to SAPTAPay@health.nv.gov to begin the RFR approval process. Please review the below policy and procedures for specific RFR instructions on how to submit and required documentation that must accompany the submission.

Policy:

It is the policy of the BBHWP to review RFRs submitted by subrecipients and contractors for line-item budget, herein referred to as "Subrecipient," to receive the reimbursement of costs for work performed by the Subrecipient within the terms and conditions of their subgrant or contract and in accordance with Title 2 of the Code of Federal Regulations (CFR) Part 200. This policy doesn't apply to the Fee-For-Schedule subawards. Please see Management Memorandum 20-002 for this policy and procedure.

Responsibility of the Subrecipient:

It is the responsibility of the Subrecipient to ensure their RFRs are compliant with the following policies and guidelines:

- A RFR is due on a monthly basis, based on the terms of the subaward/contract agreement, no later than the 15th of the month, unless authorized by the BBHWP's Bureau Chief or the Bureau Chief's delegate in writing.
- If Subrecipients or contractor has been deemed high risk due to a monitor, single audit, or risk assessment, BBHWP reserves the right to dictate to the subrecipient the RFR supporting documentation method that is required for the contractual obligation's period of performance. This criteria will be established at the time the contractual obligation is executed in writing from the Bureau.
- All required backup documentation shall be uploaded to the SFTP site, <https://dpbhsftp.nv.gov/EFTClient/Account/Login.htm#> in the specific SFTP folder that was created for the Subrecipient.
- All BBHWP-funded entities requesting reimbursement shall submit a notification email to the "SAPTA Pay" (SAPTAPay@health.nv.gov) email address without attachments.
- If an entity does not have an SFTP folder, contact Laurie Gleason at SAPTAPay@health.nv.gov. See Exhibit A for instructions to access the SFTP site.
- RFRs may include expenditures contained within a subgrant or contract's period of performance only and must be accompanied by all supporting documentation. All expenditures must be allowable in accordance with federal and State laws and regulations, and all federal grant governing guidance and program requirements. Reimbursement is based on actual expenditures **incurred** during the period being reported. Payment will not be processed without all reporting being current. Reimbursement may only be claimed for expenditures approved within the Notice of Subaward or contractual document. Any expense being claimed on a RFR that was not approved on the Notice of Subaward or contractual document must be pre-approved in writing as an authorized request and the written approval must be provided as supporting documentation to the RFR. Failure to complete this action may result in the denial of the RFR and the reimbursement of these expenses.

Requirements for Submission of RFRs:

1. The Subrecipient will submit RFRs and supporting documentation to the SFTP site, [https://dpbhsftp.nv.gov/EFTClient/Account/Login.htm#/,](https://dpbhsftp.nv.gov/EFTClient/Account/Login.htm#/) within 15 business days following the end of each month for the approved subgrant period.
2. The RFR must contain, at a minimum, the following elements:
 - i) An accurately completed and mathematically correct cover sheet that has been signed by the Subrecipient, and
 - ii) Supporting documentation (as described below in options 1 and 2) for each expenditure by budget line being requested. There are two forms of supporting documentation that BBHWP will accept:
 - (1) Supporting documentation can come in the form of an expenditure report from a financial system or equivalent software program, including Excel. If the financial system cannot provide the salary expenditures that align with the subgrant budget, time and effort timesheets can be included with the financial report. However, if travel expenses are being requested for reimbursement, a completed Travel Expense Reimbursement Claim form (State provided template) and the required receipts must be submitted with the reimbursement request(i.e., lodging receipts that reflect daily rate; parking receipts; airline costs; conference registration; rental car receipts; maps for mileage reimbursement.).

The financial report must include, at a minimum, any grant-level coding that is needed to identify the funding source that is being charged, the vendor name, the payment date, the payment amount, the check or payment voucher number, and any relevant clarifying notes.

- (2) Supporting documentation can also be copies of original invoices, receipts, payment vouchers, and timesheets (time and effort) that provide proof of payment.
- iii) Supporting documentation can also incorporate a combination of both methods described above.
3. In accordance with Title 2 of the Code of Federal Regulations (CFR) Part 200, BBHWP has the authority to ask for any additional documentation that may be required to determine if costs are allowable.
 - i) The expenditures should be limited to the subgrant's period of performance and only for the current month's expenditures, except in extreme cases that will be approved on a case-by-case basis. The period of performance on any RFR can only be for a one month period, unless the Subrecipient has received written preapproval from the BBHWP Bureau Chief or designee.
 - ii) The amount requested cannot exceed the amount of the actual expenditure.
 - iii) If there has been no fiscal activity in a given month, Subrecipients are required to submit an RFR claiming zero dollars for the month.
4. Send an email to SAPTAPay@health.nv.gov.
 - a. DO NOT attach the RFR/invoice supporting backup to the email and DO NOT copy individuals on the email.
 - b. The subject line of the email must be in the convention as follows:

RFR [Reporting Month and Year] HD # [Number] [Name of Organization]

- Example subject line: RFR May 2018 HD 16052 PACT Coalition
 - Failure to use the prescribed convention in the subject line of the email may result in a delay of payment.
 - Submit only one email per submission related to a given RFR for each given reporting month and year. Any backup documentation attached to the email when submitting RFRs/invoices may result in a delay of payment.
5. Upon submission of the email to the SAPTAPay email address, an auto-generated email message will be sent to the submitter. DO NOT reply to the auto-generated emails. This email will include the work order number generated by the tracking system.
 - By replying to the auto-generated email, a new work order is created by the tracking system and may result in a delay in payment.
 - BBHWP is using the Division of Public and Behavioral Health's internal information technology helpdesk tracking application. Although a work order number is generated and included in the email, some of the information in the auto-generated email will not apply to external parties. Providers with concerns about their submission should contact their assigned program analyst.
 6. In the instance of a denial of reimbursement claim, the Subrecipient is required to upload the revised coversheet and supporting documentation to the SFTP site. Additionally, please DO NOT send an email to SAPTAPay@health.nv.gov, but send an email to the analyst that rejected the original submission.
 7. If a Subrecipient or contractor is requesting reimbursement for an expense that the analyst has denied, but the Subrecipient believes the expense meets the following criteria (see below), a justification memorandum can be submitted to the SFTP site for the Bureau Chief's review and

decision. Please note that the Bureau Chief has final decision making authority. Written communication from the Bureau will be provided to the Subrecipient with a decision.

- a. Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
 - b. Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
 - c. Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
 - d. Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
 - e. Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.
 - f. Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period. See also §200.306 Cost sharing or matching paragraph (b).
 - g. Be adequately documented.
8. Additional emails will be sent to the submitter by BBHWP staff upon RFR submission and payment to the Subrecipient. Generally, the Subrecipient should see the payment in their bank account within five (5) business days from the date of the closure email. DO NOT reply to these emails.
 9. Contact the assigned program analyst with any questions or concerns you may have.

If you have any questions, please do not hesitate to contact Laurie Gleason at (775) 276-4612, lgleason@health.nv.gov , or Dana Rael at (775) 684-4065, drael@health.nv.gov.

To view the latest BBHWP policies and procedures, please visit the BBHWP webpage at <http://dpbh.nv.gov/Programs/ClinicalSAPTA/dta/Partners/MOT/>.