



Indiana
Department
of
Health

IDOH HIV PREVENTION: RYAN WHITE PART B REQUIREMENTS

KYRA KOFODIMOS & NIC LOVE

10/07/2020

OUR MISSION:

To promote, protect, and improve the health and safety of all Hoosiers.

OUR VISION:

Every Hoosier reaches optimal health regardless of where they live, learn, work, or play.



Learning Objectives

Attendees will:

- Understand IDOH requirements for receiving and using RWHAP funds
- Apply federal and state requirements to making decisions for service development and implementation

Funding and Compliance

Throughout this presentation, “RWHAP funds” refer to RWHAP Part B funding, **as well as** rebates generated as a result of Part B funds.

- Rebates must be used for statutorily permitted purposes under the RWHAP Part B program
- They must be used for allowable purposes for eligible clients
- Rebates are not subject to the caps on administrative costs or the percentage of core costs requirements required of other Part B funding
- Additional information about the use of rebates can be found in the HRSA HAB Policy Clarification Notice #15-04, “Utilization and Reporting of Pharmaceutical Rebates”

Compliance with requirements applies to all subrecipients of RWHAP Part B funds

- Amount of funding they receive, number of services they provide or number of clients they serve do not change compliance requirements

Outline

- Allowability and Eligibility
- Salary Support and Time and Effort (T&E)
- Subrecipient Monitoring
- Webinars & Participation
- Summary
- Q&A



Allowability and Eligibility: Legislative Requirements

Legislative Restrictions

- RWHAP funds can only pay for **allowable** services for **eligible** clients
 - Uses are included in the Ryan White statute and are further clarified through federal policy clarification notices
- RWHAP funds must be:
 - Primarily used for HIV-related services for HIV-positive people
 - Provided to eligible low-income people
 - Recipients define “low-income” – Indiana is at or below 300% FPL
 - Used for specific services
 - HRSA provides clarification in Policy Clarification Notice #16-02, “Ryan White HIV/AIDS Program Services: Eligible Individuals and Allowable Uses of Funds”

EIS

EIS includes the following four components:

- **Targeted HIV testing** to help the unaware learn of their HIV status and receive referral to HIV care and treatment services if found to be living with HIV
 - Recipients must coordinate these testing services with other HIV prevention and testing programs to avoid duplication of efforts
 - IDOH must demonstrate that HIV testing paid for by RWHAP funds cannot be paid for by any other existing resources (such as CDC funding) to avoid “supplanting” those existing funds
- **Referral services** to improve HIV care and treatment services at key points of entry
- **Access and linkage to** HIV care and treatment services such as HIV Outpatient/ Ambulatory Health Services, Medical Case Management, and Substance Abuse Care
- **Outreach Services** and **Health Education/Risk Reduction** related to HIV



Implementation of EIS

IDOH uses the RWHAP funds to provide the following EIS components:

- HIV testing



Salary Support and Time and Effort (T&E)

Salary Support

- RWHAP funds (Part B and rebates) cannot pay for services delivered to clients determined to be ineligible
- RWHAP funds cannot pay for activities that are unallowable under the legislation or HRSA HAB policy notices
- Salary support for positions must be proportionate to the effort toward allowable services for eligible clients
 - See examples on next slide

What is Time and Effort (T&E)?

- Time and Effort reporting assures that any compensation for salaries, wages and benefits (not contractors) charged to federal awards is *based on records that accurately reflect the **work performed***.
- Time and Effort is supported by a system of internal controls that *reasonably assure* that charges are accurate, allowable and properly allocated
- Time and Effort is *supported by policies and procedures* within the organization
- Time and Effort procedures must include a review process where employees and their supervisors make sure the hours they report are equal to the actual hours worked and billed correctly

T&E Requirements

- T&E reporting is required when any part of salaries, wages or benefits are paid with federal funds
- T&E must be done by anyone receiving ANY federal funding
 - This is a federal requirement, not just a Ryan White requirement
 - IDOH staff and all subrecipients receiving funding are included
- Rebates result from federal funding – T&E should be done for rebate-funded staff and subrecipients too

T&E Sources

45 CFR 75.430 – “Personal Services” (HHS Awards)

- [eCFR – Code of Federal Regulation 45 CFR 75](#)

2 CFR 200.430 – “Compensation – personal services” (Federal Awards)

- [eCFR – Code of Federal Regulations \(2 CFR 200\)](#)

IDOH T&E Policy and Procedure

- To be implemented soon



Indiana
Department
of
Health

Subrecipient Monitoring

Programmatic Requirements

- Submit aggregate data required by the Ryan White HIV/AIDS Program Services Report (RSR)
- Complete Provider Report within the RSR
- Monthly Reporting
- Annual Monitoring

Annual Monitoring Site Visits

IDOH is federally required to:

- Conduct annual on-site Programmatic/ Administrative and Fiscal visits to every subrecipient
- Monitor the subrecipient program and how funding is used to check for compliance with federal requirements
- Write a report of the visit and implement a corrective action plan if necessary



Webinars and Participation

TA Webinars and Subrecipient Meetings

- All subrecipients are expected to attend monthly technical assistance (TA) webinars
 - Communicate policy and procedure changes
 - Communicate requirements
 - Provide guidance in meeting funding expectations
 - Provide opportunities to share and learn from peers' best practices
- All subrecipients are expected to attend statewide subrecipients meetings
 - Occur 2-3 times per year
 - Some are face-to-face, some are remote



Indiana
Department
of
Health

Summary

Summary

- Service Categories utilized by HIV Prevention include “Early Intervention Services (EIS)”
- RWHAP funds can only pay for **allowable** services for **eligible** clients
- IDOH is federally required to:
 - Conduct annual on-site Programmatic/ Administrative and Fiscal visits to every subrecipient
 - Monitor the subrecipient program and how funding is used to check for compliance with federal requirements
- All subrecipients are expected to attend monthly technical assistance (TA) webinars
- All subrecipients are expected to attend statewide subrecipients meetings

Q&A

Pause



Return in 15 minutes!