

Sub-Recipient Monitoring



Indiana State
Department of Health

Presentation Objectives

- Understanding expectations of the monitoring process (including fiscal and programmatic)
- Review the documents used during the monitoring process
- Strengths and Weaknesses of the monitoring site visits



Indiana State Department of Health's Requirements While Monitoring

- Conduct one annual on-site Programmatic/Administrative and Fiscal visit to sub-recipients
- Monitor the sub-recipient program activities and fiscal policies and processes to check for compliance with federal requirements
- Provide technical assistance and strengthen collaborative relationships with sub-recipients
- Write a report of the visit and implement a corrective action plan if necessary



Why Do We Monitor?

- **It's a Federal Requirement!**

- 45 CFR 75
- Public Health Service Act 2604
- National Monitoring Standards
- HAB Policy Notice 15-01/16-02
- Department for Health and Human Services (DHHS)
- Health Resources and Services Administration (HRSA)



shutterstock.com • 340560524

ISDH has agreed as *The Pass Through Entity*, to monitor, educate, and assist sub-recipients with expending Ryan White Part B funds according to all federal guidelines.

ISDH must monitor to assure compliance programmatically and fiscally for EACH funded service category



Indiana State
Department of Health

What Can Come from Monitoring ?

- **Technical Assistance**
 - Any weak links noticed in a monitoring site visit allows ISDH to provide on site assistance to help bring recipients into compliance.
- **Partnership Power!**
- **Understanding Services**
 - Funded services are great on paper, but we like to see them in action!
 - Monitoring allows programs to have showcase of new and innovative ideas that are working to serve HIV+ clients across the state.



What are the Steps?

TO DO LIST 0

1

2

3

4

5



Step One: Before the Visit

- At least four weeks before the visit, we will let you know who is coming onsite, the proposed dates of the visit, the list of documents we will need, and our monitoring tool
 - There is a pre-screening tool used by ISDH staff to determine need and risk per site.
- Two weeks before the visit, we will set up a call with you.

This call is to establish:

- The purpose of visit
- The site visit agenda
- Determine if multiple sites need to be visited (satellite sites, administrative offices, etc.)
- Discuss entrance/exit conferences and determine who should be present
- Answer questions about requested documents
- Confirm meeting with consumers (if this is something that is needed)
- Review process for selecting client charts and making them available



Step Two: Onsite

- **Entrance Meeting**
 - ISDH reviews purpose of visit
 - Sub-recipient presents
 - 1-hour agency overview
 - How Part B services have been implemented
 - Successes and challenges of the program
- **Monitoring Activities**
 - Use review tools
 - Staff discussion and document review
- **Exit Meeting**
 - Inform sub-recipient of compliance issues and opportunities for improvement
 - Make every effort to communicate findings that will be reflected in report – no surprises!



Onsite Continued

- There are **TWO** parts to each monitoring visit: programmatic and fiscal
- Both have specific monitoring tools and requirements
- Each department also has specific staff designated to each area
- Compliance isn't just for one area, its for both!
 - Monitoring will look at the compliance factors for both programmatic and fiscal requirements

Programmatic + Fiscal =



What are we Looking For?

- **Programmatic**

- Compliance with federal requirements
- Compliance with policies and procedures
- Eligibility verification
- Payor of last resort verification
- Credentialing and Medicaid status verification if required
- Referral Relationships
- Over access to services and service standards

- **Fiscal**

- Compliance with federal requirements
- Compliance with policies and procedures
- Policies and implementation
- Program income
- Financial management
- Property standards
- Auditing requirements
- Fiscal Procedures



The Review Process

- There is a blended discussion along with document review
 - We make note if there is a need for Technical Assistance
- Compliance is checked with “Met”, “Not Met”, “Yes”, “No”
 - Partial compliance is noncompliance!
- Client files will be requested for review
- There is also a strong chance that we will want to sit with a group of clients
 - This focus group will allow clients to give their feedback on services, unmet needs, and any barriers they have



Step Three: After the Visit

- **Monitoring reports will be compiled by ISDH**
 - ISDH has 45 days from the last day of the visit to get the final report to the sub-recipient
 - These reports are generated and approved by ISDH leadership
- **Corrective Action Plan**
 - To address findings in the monitoring reports sub-recipient will submit a Corrective Action Plan within 10 working days. The corrected actions do not need to be in place within 10 working days. The plan of action needs to be distinguished, making firm deadlines and descriptions of how the improvements will develop. And the plan will be sent to ISDH within 10 working days.
 - ISDH approves/modifies the CAP within 7 working days and returns the plan back to the sub-recipient
 - ISDH monitors resolution of corrective actions
- **Follow-up Visits**



What Have we Learned?

- We all have a learning curve!
- Ryan White funding has a lot of pieces, that we need to work together to maintain
- Our sub-recipients are very open to learn the process and very willing to help develop our monitoring process
- We still have a way to go!
 - ISDH has begun site visits on our own! We currently have two more scheduled this summer, then fall visits will begin. We are still working with our HRSA Project Officer for a site-visit exemption, as well as evaluating risks assessments to create a list of upcoming visits.



What's next?

- ISDH now has a Ryan White Services Manager! Along with this position, we have contract monitoring positions in the works to help with site visits and check-ins throughout the year to help prepare and answer questions
- Quality management is an upcoming development that will be reflected on monitoring site visit
- ISDH will be in contact with each sub-recipient to give them their monitoring timeline



Questions?

