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TARRANT COUNTY
HIV ADMINISTRATIVE AGENCY

RWHAP Part A
Policies & Procedures Manual
for

Subrecipient Fiscal

Tarrant County HIV Administrative Agency
Fiscal Policies and Procedures

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A. OVERVIEW

PURPOSE:

The TC AA is accountable for the performance of the various funded HIV projects, programs or activities. In general, the requirements that apply to the TC AA, including public policy requirements, also apply to Subrecipients and contractors funded under grants, unless specified otherwise (See 45 CFR § 75.101).

The TC AA provides the compilation of Policies and Procedures referenced in this TC AA RWHAP Part A Fiscal Policy & Procedures Manual to guide Subrecipients. This document is a companion to the Subrecipient Administrative and Programmatic Policies & Procedures, and the Quality Management Policies and Procedures.

The purpose is to provide guidance for subrecipients and contractors regarding the fiscal management program. It is the responsibility of Tarrant County HIV Administrative Agency (Recipient) to ensure that all contracted entities maintain a high level of accountability in the services that they provide under the Ryan White HIV Programs. This section details the policies and procedures set by the Recipient in regard to fiscal accountability for all subrecipients that provide services under contract with Tarrant County HIV Administrative Agency. These policies are to provide guidance for fiscal management systems help the recipient and subrecipients comply with legislative, policy, and grants management requirements and manage program income, expenses, and third party contracting and reimbursement.

LEGAL AND PROGRAMMATIC REFERENCES:

Legal and programmatic references are provided in [Attachment A](#).

DEFINITIONS:

Definitions used in the policies and procedures are provided in [Attachment B](#).

SCOPE OF COVERAGE:

This policy applies to Ryan White Part A: Grant Year: March 1st-February 28th/29th; Counties served: Tarrant, Parker, Hood, Johnson.

RESOURCES:

Additional resources are provided in [Attachment C](#).

FISCAL POLICIES:

The Tarrant County HIV Administrative Agency (AA) is accountable for all HIV funding for all core and support services within the TGA and HSDA. In general, the requirements that apply to the Recipient, also apply to subrecipients, unless specified otherwise (See 45 CFR § 75.101). The AA provides this compilation of fiscal policies or other referenced sources to guide the subrecipients. There are eight major sections of the document including Attachments and Exhibits.

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B. FISCAL MANAGEMENT, OVERSIGHT, AND VIABILITY

(National Monitoring Standards (NMS): Universal: & Section D: Grantee Accountability) (National Monitoring Standards (NMS): Fiscal Standards A only: Section G: Cost Principles & Section H: Auditing Requirements); (Source: 45 CFR section 75.302(b)(1) and (3); Section 2664(a)(2) (Part C) Section 2671(d)(1) (Part D); and HAB PCN 16-02 (revision 10/22/18); HAB PCN 15-01; Part C and D NOFOs; and Notice of Award); (Sources: 45 CFR 74.21; 45 CFR 92.20; 2 CFR 215.200; NMS Section D; Funding Opportunity Announcement; and Part A Manual; 2 CFR 225 or OMB Circular A- 87; 2 CFR 230 or OMB Circular A- 122; NMS Fiscal A Section G) (RWPD Sources: Legal: Section 2671(a); Programmatic Resource; and HAB PCN-16-02 (revision 10/22/18).

Subrecipient Accountability

Programs must have appropriate financial systems in place that provide internal controls in safeguarding assets, ensuring stewardship of federal funds, maintaining adequate cash flow to meet daily operations, and maximizing revenue from non-federal sources.

The Recipient will oversee the subrecipients and determine if they have:

1. An accounting system that identifies the source and use of funds for RWHAP activities by each separate source (funding, award, or grant);
2. Records that contain information pertaining to:
 - a. Awards and sub awards,
 - b. Authorizations,
 - c. Obligations,
 - d. Unobligated balances,
 - e. Assets,
 - f. Expenditures,
 - g. Income,
 - h. Interest, and
 - i. Supported by source documentation.
3. Business Management systems that meet Federal requirements with policies that avoid fraud, waste, and abuse with accounting.
4. Documented policies and procedures and fiscal/programmatic reports that provide effective control over and accountability for all funds in accordance with federal and Ryan White programmatic requirements.

The subrecipient must have proper stewardship of all grant funds this includes procedures and contracts that require:

- Timely submission of detailed fiscal reports by funding source, with expenses allocated by service category;
- Timely submission of programmatic reports;
- A-133 or single audit.

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Each month the subrecipients need to submit to the AA reimbursement requests by the 22nd of each month through Provide Enterprise. They must include the following:

- Provide Enterprise generated service category reimbursement request;
- Cover page signed by the agency's authorized signatory

The following items could also be requested to support the reimbursement request:

- General Ledger (monthly, generated from subrecipients accounting system); or other supporting documentation acceptable to the subrecipient.
- Payroll Report (monthly, generated from provider's payroll system)
- Cost Reimbursement Monthly Expense Report

Monthly Variance Reports are created by the AA's office and reviewed with subrecipient during the contractor calls.

Reallocation and Redistribution

Under the Ryan White HIV/AIDS Treatment Modernization Act of 2009, there are significant penalties to the AA, if there are unexpended dollars at the end of the fiscal year. Therefore, all programs are expected to expend 100% of their contracted award. Contract expenses, as shown on reimbursement requests, are regularly reviewed. The purpose of this policy is to maintain a process for the AA to:

- Receive subrecipient requests for additional funding outside of the RFP process based on evidence of need;
- Request return of underutilized funding based on data;
- Outline a process and timeframe for data collection;
- Maintain a process for the AA to identify steps, regarding how the service reallocations/redistributions are prepared, submitted and implemented for Part A.
- Report/work with the Planning Council's Allocations Committee, as needed.

Part A: For Part A, The AA may redirect funds within a service category without planning council approval but requires such approval for reallocation across service categories. The planning council must be informed of the changes to service priority allocations that result from any redistribution of program funds by the grantee. As with the initial disbursement of funds, the outcome of any redistribution must be consistent with the priorities and resource allocations of the planning council.

Reallocating to New Service Categories Mid-Grant Year: Reallocation is to ensure that subrecipients have sufficient funding to meet client need. Prior to and reallocation requests to new service categories, this will be discussed with Part A Project Officer. Based on demonstrated need and available funding, reallocation to new service categories may be considered and will follow the same reallocation/redistribution policy and procedures for each funding source. This allows the AA the latitude, with Planning Council approval when required, to make changes that will better support meeting client need and expending 95% of all funding.

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Subrecipients Expenditures: Subrecipients are expected to expend funds in accordance with their approved budget and identify funds projected to be unexpended in a timely manner which would allow for redistribution of the funds. Subrecipients will:

1. Subrecipient shall be subject to decrease of funds if funds are not utilized at the anticipated rate of expenditures. The anticipated rate of expenditures is one-twelfth of the contract amount by service category per month. The formula for reduction of funds shall be as follows:
 - a. At one quarter of the contract period the Subrecipient shall have expended at a minimum twenty percent (20%) of allocated funds for each service category. If the minimum has not been expended, ten percent (10%) of the unspent funds allocated for that contract period can be swept through a budget reduction at the discretion of the TC AA.
 - b. At one half of the contract period the Subrecipient shall have expended at a minimum forty percent (40%) of allocated funds for each service category. If the minimum has not been expended, fifty percent (50%) of the unspent funds allocated for that contract period can be swept through a budget reduction at the discretion of the TC AA.
 - c. At three quarters of the contract period the Subrecipient shall have expended at a minimum seventy five percent (75%) of allocated funds for each service category. If the minimum has not been expended, one hundred percent (100%) of the unspent funds allocated for that contract period can be swept through a budget reduction at the discretion of the TC AA.

Subrecipient may become eligible for an increase in funding if it has spent its funds at the anticipated rate and can present a proposal for the utilization of additional funds by serving additional unduplicated clients and delivering additional units of service.

Reallocation and Redistribution Process: Reallocation and redistribution should only be made to service categories where there is a high priority need and an anticipated shortfall or lower than desired initial allocation. Subrecipients submit a reallocation request to the AA. The TC AA compiles the requests and submits to the Planning Council for approval:

- Schedule of Deliverable activities reflecting changes in the scope of services, funding source, or Federal or County regulations;
- Administrative requirements such as changes in reporting periods, frequency of reports, or report formats required by funding source or County regulations, policies or requirements, and/or
- Changes to subrecipient fee schedules and/or budgets.
- Changes in reimbursement methodology.

Review of reallocation requests may include the following verification:

- Review of expenditures.
- Review of service utilization.
- Review of historical spending patterns.
- Review of budget revisions.

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Auditing Requirements

Applicable if subrecipient receives more than \$750,000.00 in federal awards.

The program and federal award identification must include, as applicable, the:

1. CFDA title and number,
2. Federal Award Identification Number and year,
3. Name of the HHS awarding agency (HRSA), and
4. Name of the pass-through entity, if any.

The Single Audit (OMB A-133 Audit) is performed by an independent certified public accountant (CPA), and must be filed electronically with the Federal Audit Clearinghouse each year. The Single Audit looks at the recipient's financial records, financial statements, federal award transactions and expenditures, internal control systems, and the federal assistance it received during the audit period.

Cost Principles

The Recipient organization has approved current financial policies and procedures that are properly disseminated and consistently followed according to legislation and federal and generally accepted accounting principles. (Sources: 45 CFR 75 Sub Part D-- Standards for Financial and Program Management)

Payments made to subrecipients for services must be cost-based and relate to Ryan White administrative and programmatic costs in accordance with standards cited under 45 CFR 75, Sub Part E— Cost Principles (Sources: 45 CFR 75, Sub Part E—Cost Principles 45 CFR 75.404).

Written grantee and subgrantee procedures for determining the reasonableness of costs, the process for allocations, and the policies for allowable costs, in accordance with the provisions of applicable Federal cost principles and the terms and conditions of the award. Costs are reasonable when they do not exceed what would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs

The Recipient and subrecipient's accounting systems or another financial system record and track expenditures by each RWHAP cost category for each award.

C. ACCOUNTING SYSTEM – INTERNAL CONTROLS – CHART OF ACCOUNTS

(Sources: NMS: Fiscal Standards A only: Section K: Fiscal Procedures & Section H: Auditing Requirements; 45 CFR section 75.302(b)(3) and 307(e); Programmatic Resource; HAB PCN 15-03; and [Frequently Asked Questions for Policy Clarification Notices 1503 and 15-04](#)); DCHAP FAQs on Program income and MOE; Funding Opportunity Announcements; NOA Term on Program income; DCHAP Site Visit Fiscal Requirement #3; and 45 CFR Part 75)

Property/Equipment Standards

A subrecipient that purchases tangible nonexpendable personal property or equipment with funds (that has a useful life of more than one year and an acquisition cost of \$5,000 or more per unit) must develop and maintain a current complete and accurate asset inventory list and a depreciation schedule that lists

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purchases of equipment by funding source. The subrecipient must make the list available to the Recipient upon request.

Financial Management

The Subrecipient must have policies and procedures in place for: 1) Drawing down funds; 2) Funding Advances; and 3) Tracking Program Income.

Drawing Down Funds: The draw down of federal funds will be initiated after the County submits the monthly/quarterly Financial Status Reports. This ensures that the County has already paid for the cost of goods or services incurred on behalf of federal grants.

Funding Advance Request: Subrecipients may request one (1) Contract advance in an amount not to exceed 1/12th of the total Contract amount, and within the following requirements:

- Request made within two (2) months of final funding contract execution
- Repayment of advance in full by end of the 10th month of the contract
 - Monthly reimbursements payments will be reduced XX% of the advance to achieve this
 - Percentage is determined by what period the request is received and approved
 - Example: request approved in 3rd month of the grant (but 1st month after final funding) will result in monthly reimbursement reduced by 14.29% of the advance amount until repaid in full.
- No more than one advance request may be approved during the contract/grant year
- Advance request may not exceed 1/12th or 8.33% of the total contract amount for the current contract/grant year
- Advance request must be submitted using the Submission of Advance Agreement form and letter requesting the advance which includes a justification for the request
- The advance request should be submitted to the Financial Analyst and the HIV Grants Manager.
- A decision on the advance request will be made within three business days of an approved advance agreement. The three days approval will be based on the receipt of complete documentation
- Advance payment will be made within two weeks of approval following the County's payment process

Program Income: In the context of the RWHAP, program income is most commonly generated by the recipients and subrecipients as a result of charging for service and receiving third party reimbursement. Common examples: 1) The difference between the third-party reimbursement and the 340B drug purchase price, 2) Reimbursements from private and public health insurance, and 3) Patient payments on the sliding fee scale. In the evolving healthcare landscape, RWHAP recipients and subrecipients may generate higher levels of program income (through 340B, Medicaid expansion, state/federal marketplace).

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- *Recordkeeping:* Subrecipients must maintain records on any program income that is received and how it was used and must make this information available to the Grant Recipient upon request. The Subrecipient shall have policies and procedures for handling RWPA revenue including program income.
- *Track- Monitor and Report:* The Recipient and subrecipient must have a methodology to track, monitor, and report the various sources program income according to PCN 16-02. The methodology must include identification of all program income received and expended and the RWHAP programs under which they were generated. Recipients are required to track and account for all program income in accordance with 45 CFR § 75.302(b)(3). Recipients must report program income on their Federal Financial Report (FFRs). Additionally, it is the responsibility of the recipient to monitor and track program income earned by subrecipients. Subrecipients should retain program income for “additive” use within their own programs. Consequently, program income earned by subrecipients should not be reported on the recipient’s FFR.
- *Award Identification:* RWHAP program and federal award identification must include, as applicable, the:
 1. CFDA title and number,
 2. Federal Award Identification Number and year,
 3. Name of the HHS awarding agency (HRSA), and
 4. Name of the pass-through entity, if any.
- *Exclusions:* Except as otherwise provided in Federal statutes, regulation, or the terms and conditions of the Federal award, program income does **not** include rebates, credits, discounts, and interest earned on any of them.
- *“Additive:* In addition the PCN 16-02 it states, “HAB has determined that for RWHAP recipients and subrecipients, the use of program income will be **“additive”** (as documented in the Notice of Award). Under the “additive” alternative, program income must be used for the purposes for which the award was made, and may only be used for allowable costs under the award.

D. BUDGET MANAGEMENT AND CONTROLS

(NMS Fiscal Standards A only: Section A: Limitation on Uses of Part A funding & Section E: Financial Management)

Financial Management

The financial management of grant awards Include a review of subrecipient and contractors for:

- Financial operations including accounting policies and procedures
- Purchasing and procurement policies and procedures that Include:
 - Payments for services
 - Program income
 - Revision of budget and program plans

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- Non-federal audits
- Property standards, including insurance coverage, equipment, supplies, and other expendable property
- Procurement standards, including recipient responsibilities, codes of conduct, competition, procurement procedures, cost and price analysis, and procurement records
- Reports and records, including monitoring and reporting, program performance, financial reports, and retention and access requirements
- Termination and enforcement and closeout procedures

The Recipient and the subrecipient budgets and reports must have sufficient detail to account for Ryan White funds by service category, subgrantee, administrative costs, and core medical and support services rules, and to delineate between multiple funding sources and show program income.

Unit Costs

If unit costs are negotiated with and approved by the Recipient, the subrecipient must have systems in place that can provide expense and client utilization data in sufficient detail to calculate that unit cost and have unit cost calculation available for Recipient review.

- A unit cost cannot exceed the actual cost of providing the service.
- Calculation of unit costs must utilize a formula of allowable administrative costs capped at 10% of direct program costs plus allowable program costs divided by number of units of delivered. In the Frequently Asked Questions (FAQs) presented by HRSA's HIV/AIDS Bureau (HAB) on Policy Clarification Notice (PCN) #15-01 Treatment of Costs under the 10% Administrative Cap for Ryan White HIV/AIDS Program Parts A, B, C, and D this document is intended to provide additional context and background for PCN #15-01 as Recipients and Subrecipients seek to understand and operationalize the policy changes, and it will be referenced as an addition to PCN #15-01.

Billing Requirements

Subrecipients are required to submit monthly invoices for each service category/contract to the Recipient no later than the 22nd day of the month following the month services were provided (or other date designated by the Grant Recipient). Subrecipients are responsible for submitting bills that only include eligible clients, services and units. Billings including ineligible clients, services or units will not be reimbursed until provider deletes the ineligible units from Provider Enterprise.

At a minimum, the following documents will be due to the AA's office on the twenty-second of each month (or day designated by the Grant Recipient) in the format required as explained below. Documents must be submitted electronically through Provide Enterprise with an email confirmation.

Procedures for Reimbursement

Subrecipient must submit complete monthly reimbursement requests through Provide Enterprise within 22 days following the end of each month. The reimbursement request must contain supporting documentation including statistical and programmatic reports. A final close-out bill may be submitted no later than 30 days following the end of the contract term.

Reimbursement requests should be submitted in Provide, and signature pages attached in Provide to Reimbursement requests. To be considered a complete request, the following must be included:

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- Cover page signed by the agency's authorized signatory
- Provider Enterprise reimbursement requests
- Provide Enterprise activity report with monthly service utilization data The following may be requested to substantiate a reimbursement request:
- General Ledger (monthly, generated from subrecipients accounting system); or other supporting documentation acceptable to the subrecipient.
- Timesheets or Payroll Report (monthly, generated from provider's payroll system)
- Cost Based Reimbursement Monthly Expense Report

Reimbursement requests will be reviewed to assure compliance with approved budget, federal cost principles, and contract goals.

Payments

Tarrant County approves and pays reimbursement requests within 30 days of receipt of a complete request. Errors in the reimbursement request, including insufficient documentation, may result in payment delays. It is the responsibility of the subrecipient to submit a complete and accurate reimbursement request.

Late billing submissions and extensions

Extensions for late billing submissions should be requested in writing and include the date by which the required documents will be submitted.

Cost Based Reimbursement

The Program is a cost reimbursement program.

Limitations on Uses

Policies in place to preclude staff from charging unallowable costs to federal grants.

Administrative Costs

For each contract, the budgeted administrative costs and direct service costs must be delineated. A Provider's administrative costs, including indirect cost rates, cannot exceed 10% of the total direct service costs, unless approved by the Recipient. Only United States Department of Health and Human Services (HHS) negotiated indirect rates will be accepted unless an exception is approved by HHS.

The Recipient also imposes the 10% administrative cost cap for all subcontracts granted by the original subrecipient for services. This means that a subrecipient that utilizes subcontracts for services under the RW contracts must also ensure that its subcontractor limits its administrative costs to no more than 10% of their direct service costs.

Ryan White regulations limit aggregated subrecipient/subcontractor administrative expenses to no more than 10% of service dollars. The Recipient may consider payment of subrecipient/subcontractor administrative costs that exceed 10% of their direct service costs on availability of funds.

Section 2604(f)(3) of the CARE ACT defines allowable contractor/subcontractor administrative activities to include:

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1. Usual and recognized overhead activities, including rent, utilities and facility costs, and established indirect rates for agencies;
2. Costs of management and oversight of specific programs funded under this title, including program coordination, clerical, program evaluation, and financial and management staff not directly related to patient care; and
3. Liability insurance, audits, computer hardware/software not directly related to patient care.

Typical examples of administrative costs for subrecipients/subcontractors include general administration and general expenses. Examples include salaries and expenses of executive officers, personnel administration, accounting, the costs of operating and maintaining facilities, and depreciation or use allowances on buildings and equipment. Management and oversight activities are costs associated with:

1. Receipt and disbursement of program funds;
2. Development and establishment of reimbursement and accounting systems;
3. Preparation of routine programmatic and financial reports, including the minimum requirements of completing the Ryan White Service Report (RSR);
4. Compliance with contract conditions and audit requirements; and
5. Monitoring of and reporting on any subcontracts through telephone consultation, written documentation, or on-site visits.

Subrecipients and their subcontractors are required to submit an expense report with their monthly billing statement that identifies administrative and direct service expenses with sufficient detail to permit review of administrative cost elements. The final determination for cost allocations between Administrative Costs and Direct Costs resides with the Recipient.

GIFT CARD POLICY

Health Services and Resource Administration (HRSA) grants managed by Tarrant County HIV Administrative Agency (TC AA) allows for the distribution of Gift Cards in two different circumstances:

- Where a direct provision of the service is not possible or effective, store Gift Cards must be used that can be exchanged for a specific service or commodity (e.g., food or transportation), and
- As incentives for eligible grant participants that further the goals and objectives of Ending the HIV/AIDS Epidemic.

Purpose:

The purpose of this document is to establish a policy for the purchase and distribution of Gift Cards to ensure proper handling and accountability of these cards. Gift Cards are susceptible to potential misuse and various risk exposures; this policy intends to minimize or eliminate any risk.

Authority:

Ryan White HIV/AIDS Program (RWHAP) Services: Eligible Individuals & Allowable Uses of Funds Policy Clarification Notice (PCN) #16-02: Where direct provision of the service is not possible or effective, store gift cards, vouchers, coupons, or tickets that can be exchanged for a specific service or commodity (e.g., food or transportation) must be used. HRSA RWHAP recipients are advised to administer voucher and store gift card programs in a manner which assures that vouchers and store gift cards cannot be exchanged for cash or used for anything other than the allowable goods or services, and that systems are in place to account for disbursed vouchers and store gift cards.

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Ending the HIV Epidemic: A Plan for America — Ryan White HIV/AIDS Program Parts A and B Notice of Award: Where direct provision of the service is not possible or effective, store gift cards, vouchers, coupons, or tickets that can be exchanged for a specific service or commodity (e.g., food or transportation) must be used. Store gift cards that can be redeemed at one merchant or an affiliated group of merchants for specific goods or services that further the goals and objectives of the EHE are also allowable as incentives for eligible program participants.

Guidelines:

TC AA will purchase Gift Cards that meet the following requirements:

- Gift Cards cannot be exchanged for cash or used for anything other than the allowable goods or services, and systems are in place to account for disbursed Gift Cards.
- Every attempt will be made to purchase Gift Cards on which it states 'Alcohol/Tobacco/Firearms/Lottery purchases are Prohibited'.
- Gift Cards shall not be purchased for or given to any employee of the Tarrant County Ryan White HIV/AIDS program, which includes Tarrant County HIV Administration Agency Staff and North Central HIV Planning Council Support Staff.
- TC AA will provide procedures and internal controls for Gift Cards, including but not limited to:
 - Documented processes for purchasing, requesting, distributing, and tracking of Gift Cards held by TC AA.
 - Gift Cards purchased for distribution to Subrecipients for services when the direct provision is not possible or effective will meet the same process controls and audit requirements for Gift Cards held by the TC AA.
 - Monthly reconciliation audits will be conducted by the TC AA Financial Analyst. The Financial Analyst will work with the Tarrant County Internal Auditor's department as cash audits are conducted. Audit findings will be reported as per Tarrant County Internal Auditor's procedures.
 - TC AA staff will conduct monthly reconciliations to ensure compliance.
- Subrecipients will have an approved Gift Card Policy and document Gift Card information in client level data system.
 - Gift Cards for Services i.e. food or transportation: up to \$50.00 per issuance

NOTE: The following are applicable SOLELY to TC AA in the use of gift cards for the EHE-funded activities.

- Gift Cards for grant participation incentives:
 - Eligible participants are people with HIV/AIDS.
 - Participants must actively engage in event/meeting conducted by TC AA that furthers the goals and objectives of Ending the HIV/AIDS Epidemic. Each event/meeting will include a disclaimer stating incentives are only available for ACTIVE contribution in the event/meeting.
- Incentives are based on duration of event/meeting and the breakdown is as follows:
 - Duration: 1 hour and 15 minutes - \$25.00
 - Duration: 1 hour and 16 minutes up to 2 hours and 30 minutes - \$50.00
 - Duration: over 2 hours and 30 minutes - \$75.00
- Possible additional incentives include:
 - Recruitment and Participation Coordination - \$50.00
 - Recruitment and Presentation Coordination - \$100.00

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E. PAYROLL/ACCOUNTS PAYABLE

(NMS: Fiscal Standards A only: Section B: Unallowable Costs, Section C: Income from Fees for Services Performed & Section D: Imposition & Assessment of Client Charges) Sources: Fair Labor Standards Act (29 CFR Part 516); 45 CFR 75.405; 45 CFR 75.302; and 45 CFR 75 Appendix VI).

Fiscal Standards for Payroll

The Recipient and subrecipient have policies and procedures in place to allocate personnel costs including the allocation of human resources.

Time and Effort: The Recipient will review that each subrecipient has a policy and procedure for time and effort. This policy and procedure must meet the standards for documentation of personnel expenses for all employees on the line item budget, according to 45 CFR section 75.430(i). If applicable, the Recipient will document the allocation of payroll between funding sources for individuals paid across multiple funding sources according to 45 CFR section 75.430(i), Subpart F.

Procedures for Allocation of Personnel and Fringe Costs to Ryan White

This procedure applies to employees of the Ryan White Part A Subrecipients who perform grant-funded activities. This procedure is to assure compliance with Uniform Grant Management Standards, ATTACHMENT A and ATTACHMENT B.

- Staff are required to complete and submit a weekly or bi-weekly time report.
- Time report must have the following certification statement: “I certify that, to the best of my knowledge, allocation of time expended performing Federal, State, and other program duties is true and accurate.”
- Staff must record actual time spent performing grant activities by funding source and funding code. Pre-determined time percentages may not be utilized.
- Hours reflected on the time report must reconcile with what is recorded in financial system.
- Time report must be signed by respective manager.
- Approved time reports must be available upon request by the HIV Administrative Agency
- Time reports are available upon request.
- Time and Effort – all staff is required to provide documentation that shows their daily activity is allowable and allocable to their grant allocation.
 - This can be completed by a daily activity log, Activity by Provider report, and/or a print out of Outlook weekly agenda detailing activities performed.

Unallowable Costs

In addition to unallowable costs found in the cost principles outlined by the Uniform Guidance, funds are further restricted by the Health Resources Services Administration (HRSA). The HRSA Fiscal Monitoring Standards specifically forbid the use of Ryan White funds for the following unallowable expenses:

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- Purchase or improvement of land or to purchase construct, or permanently improve any building or facility (other than minor remodeling).
- Direct Cash Payments. No use of Ryan White program funds to make direct payments of cash to clients. A cash payment is the use of some form of currency (paper or coins). Gift cards must be store gift card; therefore they are not considered to be cash payments; however, the use of gift cards includes restrictions and must be pre-approved by the recipient. Subrecipients must have an approved gift card policy in place prior to distributing gift cards.
- Salaries in excess of Executive Level II cap for the grant year.
- The subrecipient is required to have a policy in place that prohibits the use of funds for cash payments to clients. No direct cash payments to clients.
- Maintain documentation of policies that prohibit use of Ryan White funds for cash payments to service recipients.
- Development of materials designed to promote or encourage intravenous drug use or sexual activity, whether homosexual or heterosexual requirements related to equipment purchases.
- Purchase of vehicles without written approval by the Grants Management Officer at HRSA.
- Non-targeted marketing promotions or advertising about HIV services that target the general public (poster campaigns for display on public transit, TV, radio public service announcements, etc.).
- Broad scope awareness activities about HIV services that target the general public.
- Outreach activities that have HIV prevention education as their exclusive purpose.
- Influencing or attempting to influence members of Congress and other Federal Personnel.
- International travel.
- Additional restrictions may also be identified within contracts specific to a service category, including:
 - Non-Food Products – funds may not be used for household appliances, pet foods or products.
 - Syringe Exchange –funds may not be used for syringe exchange programs.
 - Residential Substance Abuse Treatment –funds may not be used for inpatient detoxification in a hospital setting.
 - Vision Care –funds may only be used for optometric or ophthalmic services and purchase of corrective prescription eye wear that is necessitated by HIV infection.
 - Employment Services –funds may not be used to support employment, vocational rehabilitation, or employment-readiness services.
 - Clothing –funds may not be used for purchase of clothing.
 - Transportation –funds may not be used for clients to travel to appointments other than those that support their HIV medical care and the support services required to keep them in care.
 - Prevention Education Services –funds may not be used for basic HIV education, addressing sexually-transmitted diseases or condom distribution. In addition, any education activities NOT directly linked to increasing access of the target populations to HIV care services are disallowed.
 - All services provided in a correctional system must be approved by the Recipient and the Project Officer.

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Imposition of Charges and Annual Cap on Charges

The subrecipient must comply with the requirement that individuals with annual individual income at or below 100% of the Federal Poverty Level cannot be charged for RWHAP services. The Recipient will monitor the subrecipient to determine if they impose a charge for services to RWHAP clients with an annual individual income greater than 100% of the Federal Poverty Level. The Recipient will monitor the subrecipient for:

1. Does the subrecipient have billing, co-pay and sliding fee policies that do not act as a barrier to providing services regardless of the client's ability to pay?
2. Does the subrecipient maintain a file of individuals refused services with reasons for refusal specified; including in the file any complaints from clients, with documentation of compliant review and decision reached?
3. Did the subrecipient develop and implement a schedule of charges for RWHAP services that is publicly available?
4. Does the subrecipient adhere to the annual aggregate cap on charges requirements, without regard to whether the charges are characterized as enrollment fees, premiums, deductibles, cost sharing, copayments, coinsurance, or similar charges?
5. Does the subrecipient have a system in place to ensure they do not impose charges on a client when they reach their annual (calendar year), aggregate cap on charges?

G. MONITORING SUBRECIPIENTS

(Sources: Part A Manual 2013; FY 2016 FOA Inspector General 2004 OEI-02-01-00641; Part A and B Fiscal Standards and delineated in the Code of Federal Regulations (CFR), the Office of Management and Budget (OMB) circulars, the Ryan White HIV/AIDS Program legislation, the Part A and B Guidance's, and any letter or Policy Information Notices (PINs) issued by HRSA.)

Fiscal monitoring - Fiscal monitoring is conducted by the Tarrant County Auditor's Office and Collaborative Research

Any agency receiving federal funding is required to monitor for compliance with federal requirements and programmatic expectations. The agency reviewing (Recipient or subrecipient) has a documented procedure for monitoring its contractors for compliance with federal and programmatic expectations. The main required activity is an annual grantee-monitoring visit to all subgrantees, unless exempted by HRSA. The visits must be standardized through published fiscal monitoring policy and procedures, which should include but not limited to:

- Protocols for the visit;
- Use of a monitoring tool or guide;
- Issuing a monitoring report for each visit that addresses required elements, including subgrantee strengths as well as any compliance issues; and a
- Corrective action plan for each compliance issue. Further, the Recipient and/or subrecipient must follow through to ensure completion of the goals of the corrective action plan. (Source: Standard 3; Section E, Universal Monitoring Standards)

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Corrective Action Plan: Recipient must have a corrective action plan for subrecipients that do not meet program and fiscal legislative requirements. Establish and implement monitoring policies that require a compliance report that:

1. Lists in order of gravity the identified non-compliance activities;
2. Requires a corrective action plan, and
3. Establishes a time limit for response and implementation of measures that will bring sub-recipient into Compliance.

Fiscal monitoring activities: Recipient will monitor subrecipients to ensure that Ryan White funding is being used for approved purposes. The Recipient will review subrecipient's:

1. Fiscal monitoring policy and procedures,
2. Fiscal monitoring tool or protocol, and
3. Fiscal monitoring reports.

Documentation: The Recipient will document evidence of sub-recipients' fiscal monitoring activities including:

1. Records reviews;
2. Supporting documentation of paid expenditures;
3. An annual financial audit by a qualified independent accountant; and
4. A copy of all subrecipient procurement documents; agreements; contracts; and invoices.

G. RISK ASSESSMENT

Sources: HHS Grant Technical Assistance Guide

Risk Assessments:

Tarrant County performs an annual risk assessment evaluating each subrecipient's risk of noncompliance with statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate monitoring.

Internal Control Questionnaire/Risk Assessment



Subrecipient Name:	
Entity Identifier Number:	
Fiscal Year:	
Completed by:	

Area	#	Question	COMPLETE THIS COLUMN	COMPLETE THIS COLUMN	Weight	Score
			Assessment	Explanation		
Control Environment	1	Is there a communication process between the organization and the board?			1	1
	2	Does the board provide oversight to financial activities?			1	1
	3	Is the organization current with payments of accounts payable, payroll taxes, loans, etc.? If no, please explain.			1	1
	4	Are there written job descriptions with set salary levels for each employee?			1	1
	5	Are key employees required to take annual leave?			1	1
	6	Is your accounting system secured and/or protected by; location, use of passwords, access limits, and segregation of duties?			1	1
	7	Does your organization have written policies and procedure for: - Purchasing/Procurement - Personnel - Accounting - Safeguarding of Assets - Preventing Fraud and Reporting Suspected Fraud - IT and computer use policies			1	1
	8	Does your organization assess risk for subcontractor non-compliance with federal statutes or Uniform Guidance, as applicable (depending on grant funding source)? For yes, please provide a copy your subcontractor monitoring policy, if available.			1	1
Control Activities	1	Does your organization allocate costs between contracts and/or programs?			1	1
	2	Does the accounting system have the capability of identifying the receipt and expenditures of program funds and program income separately for each contract/program?			1	1
	3	Does the accounting system provide for the segregation of direct and indirect expenses and the allocation of indirect costs?			1	1
	4	Do all purchases require approval from an authorized individual in the requesting department?			1	1
	5	Are purchase orders/requisitions controlled in such a way that they can all be accounted for (e.g., by sequential pre-numbering, by entry in a register)? If yes, please explain the system used.			1	1
	6	Are unused checks safeguarded and in the custody of a person who does not manually sign checks, control the use of facsimile signature plates or operated the facsimile signature machine? Please indicate name and title of person who has custody of unused checks.			1	1
	7	Is there additional review or special approval required for checks exceeding a specified dollar amount? If yes, please explain			1	1
	8	Are the following practices prohibited: drafting of checks to cash; signing blank checks; removal of blank checks from the checkbook?			1	1
	9	Do supporting documents accompany checks for the check signer's signature?			1	1
	10	Are invoices marked to identify allocation of payment?			1	1

	11	Does your organization require individual time or activity sheets to be prepared at least monthly for personnel (part-time, full-time, and/or in-kind volunteers)?			1	1
	12	Are payroll expenditures tested for validity?			1	1
General	1	Is the organization new to operating or managing state and/or federal funds?			1	1
	2	Is the organization currently or previously been suspended or debarred from doing business with the federal government?			1	1
	3	Has there been a change in ownership or key management, or significant turnover in the last 2 years? If yes, please list positions and duties of vacant positions below.			1	1
	4	Is the organization "doing business" with any individual(s) who is related to a member of the Board of Directors by blood, adoption or marriage? If yes, please explain the business relationship.			1	1
Audit	1	Is your organization subject to the Single Audit requirement in accordance 2 CFR 200 Subpart F?			1	1
	2	In the past 3 years, has your organization had any findings or questions costs?			1	1
	3	Is the accounting system organized to allow an auditor to trace financial report balances through the general ledger and other summary ledgers/journals to each detail accounting transaction and supporting source documentation?			1	1
Financial	1	Are bank statements reconciled at least monthly? If so, please provide the name and title of the preparer and reviewer.			1	1
	2	Does your organization have a system for tracking: Voided checks; credit card transactions, other electronic transactions?			1	1
	3	Does someone independent of the cash receipt process reconcile receipt records to transaction records?			1	1
	4	Does your organization have adequate segregation of duties over payroll, (ex. HR is responsible for entering new/changing employee information, wages changes, and deductions, while payroll staff is responsible for processing payroll)?			1	1
	5	Does your organization have adequate segregation of duties over Accounts Payable Activities, (ex.someone independent is responsible over vendor maintenance and banking functions)?			1	1
	6	Are all expenditures reconciled with your general ledger? If no, please explain.			1	1
	7	Do the financial reports show an insufficient fund balance after meeting its obligations?			1	1
	8	Do the organization's financial reports indicate cash flow problems?			1	1
	9	Does the Balance Sheet indicate that the organization pays its bills?			1	1
	10	Has the organization operated at a loss for the current or past periods?			1	1
	11	Do financial statements or management letters disclose potential financial problems?			1	1

Total Risk Score

Legend			
Low Risk	Less than	10	
Medium Risk	Between	10	- 29
High Risk	Greater than	29	

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H. ATTACHMENTS

ATTACHMENT A: FISCAL LEGAL AND PROGRAMMATIC REFERENCES

Ryan White Part A Authority

The requirements and citations listed in this document were retrieved on 1/25/2019 from, the DMHAP Part A Site Visit Fiscal Review Tool- dated May 19, 2016 and the DMHAP Part A Administrative Program Site Visit Review Tool dated February 27, 2015. This guidance is based upon applicable federal statutes, federal regulations, and HAB’s Policy Clarification Notices (PCNs) and Program Letters as noted:

- DMHAP Fiscal tool 2016—“Fiscal Procedures—Recipient has fiscal policies, procedures, and systems to handle revenue and expenses according to Federal regulations as stated in policy and procedures (municipality)” “All standards are based on legislation, NOA, CFR, and the National Monitoring Standards.”
- DMHAP Program tool 2015 the tool contains “...elements that are either required by law, by regulation, or by program expectations such as those outlined in the HRSA/HAB Universal and Part A monitoring standards. The standards provide benchmarks that meet Title XXVI of the PHS Act as amended by the Ryan White HIV/AIDS Treatment Modernization Act of 2006 and 2009 legislation and other applicable federal legislation, regulations and program expectations.”

Applicable Laws and Regulations as noted in the site visit tools (In Order of Preference)

- Fiscal Review Tool only: Title XXVI of the Public Health Service Act, Sections 2601-2610, and 2693(b)(2)(A) (42 USC 300ff-11 – 300ff-20, and 300ff121(b)(2)(A)), as amended by the Ryan White HIV/AIDS Treatment Extension Act of 2009 (P.L.111-87)
- Administrative / Program Tool only: Title XXVI of the Public Health Service Act, 42 USC. Section 300ff-11s as amended by the Ryan White HIV/AIDS Treatment Extension Act of 2009 (P.L.111-87)
- Both Fiscal & Administrative / Program Tools:
 - 45 CFR 75 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards. https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=91d21c164a2a8ea73a9a9627b33fe002&ty=HTML&h=L&r=PART&n=pt45.1.75#se45.1.75_12
 - Department of Health and Human Services (HHS) and Public Health Service Recipients management policies
 - HRSA/HAB policy notices, letters, and guidelines <https://hab.hrsa.gov/program-grants-management/ryan-white-hiv-aids-program-recipient-resources>
 - Part A Funding Opportunity Announcements and another Program Guidance
 - Notices of Award and Conditions Of Award
 - Office of Inspector General (OIG) reports and recommendations

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- Manuals and Guides issued by HRSA/HAB including the National Monitoring Standards which can be accessed at the following link: :
<http://hab.hrsa.gov/manageyourgrant/recipientbasics.html>.

Grant funds are allocated (budgeted and expended) for allowable RWHAP activities in alignment with applicable RWHAP legislation, federal regulations and programmatic requirements. This includes the requirements regarding the distribution of funds.

Programmatic: HAB Policy Clarification Notices (PCN) 11-04, 13-07, 15-01, 15-02, 15-03 and 16-02
<https://hab.hrsa.gov/program-grants-management/policy-notice-and-program-letters>; June 22, 2016 RWHAP, PCN 21-02 and PrEP

https://hab.hrsa.gov/sites/default/files/hab/Global/prepletter062216_0.pdf program letter; U.S. Department of Health and Human Services (HHS) HIV treatment guidelines (Adolescent/Adult ARV, Pediatric ARV, Opportunistic infections, etc.) <http://aidsinfo.nih.gov/guidelines>

Uniform Guidance: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards (UAR) 45 CFR part 75. On December 26, 2013, the Office of Management and Budget (OMB) published new guidance for Federal award programs, OMB Uniform Guidance: Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Guidance), 2 CFR Part 200. The Guidance will supersede and streamline requirements from OMB Circulars A-21, A-87, A-110, A-122, A-89, A-102 and A-133 and the guidance in Circular A-50 on Single Audit Act follow-up. It is a key component of a larger Federal effort to more effectively focus Federal grant resources on improving performance and outcomes while ensuring the financial integrity of taxpayer dollars.

https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=91d21c164a2a8ea73a9a9627b33fe002&ty=HTML&h=L&r=PART&n=pt45.1.75#se45.1.75_12

Scope of the assessment

This review tool is not a complete inventory of legal and programmatic requirements or intended to be an exhaustive checklist. The review tool does not constitute legal advice but guidance.

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ATTACHMENT B: DEFINITIONS

Administrative or Fiscal Agent: Entity that functions to assist the Ryan White HIV/AIDS Program recipient or planning body in carrying out administrative activities (e.g., disbursing program funds, developing reimbursement and accounting systems, developing funding announcements, monitoring contracts).

Federal Poverty Level (FPL): A measure of income issued every year by HHS. Federal poverty levels are commonly used to determine eligibility for certain programs and benefits such as Medicaid, Food Stamps, the Children's Health Insurance Program (CHIP), and RWHAP.

High Priority Critical Service Needs: Service categories that are both high priority and have strong relation to enrolling clients in and maintaining access to HIV related medical services.

Imposition of Charges: All activities, policies, and procedures related to assessing RWHAP patient charges as outlined in legislation.

Maintenance of Effort is to ensure federal Ryan White Program funds expand HIV-related services and do not supplant state contributions to HIV-related programs ☐

Nominal Charge: A fee greater than zero.

Office of Management and Budget (OMB) : The office within the executive branch of the Federal government that prepares the President's annual budget, develops the Federal government's fiscal program, oversees administration of the budget, and reviews government regulations.

Planning Council (PC): North Central Texas HIV Planning Council that has responsibility for the legislative mandates of Priority Setting and Resource Allocation (PSRA) and the Assessment of the Administrative Mechanism.

Program income: Program income is defined as the gross income received by a recipient or subrecipient that is directly generated by a grant supported activity or earned only as a result of a federal award during a contract period. Examples: the difference between the third-party reimbursement and the 340b drug purchase price (i.e., 340b revenue); charges imposed on clients for services, as required by RWHAP Part A legislation (sliding fee scale charges); and funds received by billing public or private health insurance for services provided to eligible Ryan White HIV/AIDS Program (RWHAP) clients.

Reallocation of Funds: Movement of funds between service categories (e.g. case management to food pantry) within or across subrecipient.

Redistribution of Funds: Movement of funds from one contract to another within the same service category (e.g. housing agency A to housing agency B).

Schedule of Charges: Fees imposed on the RWHAP client for services based on the client's annual gross income. A schedule of charges may take the form of a flat rate or a varying rate (e.g. sliding fee scale). The schedule of charges is how you know what amount of money to charge a client. The schedule of charges applies to uninsured clients with incomes above 100% FPL, and may be applied to insured clients as determined by RWHAP recipients' policies and procedures. When applied to insured clients,

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recipients should consider how their policy will be applied uniformly to all insured clients, rather than on a case-by-case basis.

Subrecipient: The legal entity that receives Ryan White HIV/AIDS Program funds from a recipient and is accountable to the recipient for the use of the funds provided. Subrecipients may provide direct client services or administrative services directly to a recipient. Subrecipient replaces the term "Provider (or service provider)."

Sub-Recipient _____
 Date of review: _____
 Reviewer: _____
 Grant: _____
 Period for review: _____

PERSONNEL

Staff	Annual Salary	Monthly salary	Amount billed to RWI	Amount billed to RWII	Amount billed to Part C	Amount billed to SS	Total billed	Do these amts match alloc %?	Match Payroll register?	Match G/L?	Pd ck #	Date check cleared bank
	-	-					-					
		-					-					
		-					-					
		-					-					
		-					-					
	-						-					
	-	-					-					
	-	-					-					
Total Salaries			-	-	-	-	-					

Sub-Recipient _____
 Date of review: _____
 Reviewer: _____
 Grant: _____
 Period for review: _____

SUPPLIES/OTHER

	Amount billed to RWI	Amount billed to RWII	Amount billed to Part D	Amount billed to SS	Total billed	Do these amts match alloc %?	Match G/L?
MEDS/DRUGS	-	-	-	-	-		
Supplies	-	-	-	-	-		
Medical Supplies	-	-	-	-	-		
Facilities & Administrative Costs (Peggy Byrd)	-	-	-	-	-		
Pharmacy	-	-	-	-	-		
Postage	-	-	-	-	-		
Local Drugs (Medicine)	-	-	-	-	-		
Telephone	-	-	-	-	-		
Equipment Lease	-	-	-	-	-		
Utilities	-	-	-	-	-		
Security	-	-	-	-	-		
Bldg Maint	-	-	-	-	-		
Indirect	-	-	-	-	-		
Subtotal Supplies/Other	-	-	-	-	-		

CONTRACTURAL

	Amount billed to RWI	Amount billed to RWII	Amount billed to Part C	Amount billed to SS	Total billed	Do these amts match alloc %?	Match G/L?
TESTING-NONE BILLED IN MAY	-	-	-	-	-		
Contract, Administrative	-	-	-	-	-		
Contract Maintenance	-	-	-	-	-		
Contract Transportation	-	-	-	-	-		
Contract Labs	-	-	-	-	-		
Indirect	-	-	-	-	-		
Van Service	-	-	-	-	-		
Subtotal contractual	-	-	-	-	-		

OTHER

	Amount billed to RWI	Amount billed to RWII	Amount billed to Part C	Amount billed to SS	Total billed	Do these amts match alloc %?	Match G/L?
NONE BILLED	-	-	-	-	-		
OAMC Patient Visits	-	-	-	-	-		
MTS client transportation	-	-	-	-	-		
Indirect MTS client transportation	-	-	-	-	-		
Emergency Assistance	-	-	-	-	-		
Subtotal Other:	-	-	-	-	-		

GRAND TOTAL BILLING BY GRANT:

indirect	-	-	-	-	-		
----------	---	---	---	---	---	--	--

Timesheet Allocation - Populate from Timesheet

Employee	Total Hrs wrkd	A	B	C	D	SS	Other	ck. Figure
Empl 1	80.00	2.00	5.00	8.00	10.00	10.00	45.00	80.00 -
Empl 2	80.00	2.00	5.00	8.00	10.00	10.00	45.00	80.00 -
Empl 3	80.00	2.00	5.00	8.00	10.00	10.00	45.00	80.00 -
Empl 4	80.00	2.00	5.00	8.00	10.00	10.00	45.00	80.00 -
Empl5	80.00	2.00	5.00	8.00	10.00	10.00	45.00	80.00 -

Employee	Pay Period Amt	Part A		Part B		Part C		Part D		SS	
		% to grant	Amount to Grant	% to grant	Amount to Grant	% to grant	Amount to Grant	% to grant	Amount to Grant	% to grant	Amount to Grant
Empl 1		3%	-	6%	-	10%	-	13%	-	13%	-
Empl 2		3%	-	6%	-	10%	-	13%	-	13%	-
Empl 3		3%	-	6%	-	10%	-	13%	-	13%	-
Empl 4		3%	-	6%	-	10%	-	13%	-	13%	-
Empl5		3%	-	6%	-	10%	-	13%	-	13%	-

HIV/AIDS Bureau, Division of Metropolitan HIV/AIDS Programs **National Monitoring Standards for Ryan White Part A Grantees: Fiscal – Part A**

Table of Contents

- [Section A: Limitation on Uses of Part A funding](#)
- [Section B: Unallowable Costs](#)
- [Section C: Income from Fees for Services performed](#)
- [Section D: Imposition & Assessment of Client Charges](#)
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- [Section H: Auditing Requirements](#)
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- [Section J: Maintenance of Effort](#)
- [Section K: Fiscal Procedures](#)
- [Section L: Unobligated Balances](#)

“On December 26, 2013, the Office of Management and Budget (OMB) published new guidance for Federal award programs, OMB Uniform Guidance: Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Guidance), 2 CFR Part 200. The Guidance will supersede and streamline requirements from OMB Circulars A-21, A-87, A-110, A-122, A-89, A-102 and A-133 and the guidance in Circular A-50 on Single Audit Act follow-up. It is a key component of a larger Federal effort to more effectively focus Federal grant resources on improving performance and outcomes while ensuring the financial integrity of taxpayer dollars. Please note that the Uniform Guidance will not apply to grants made by the Department of Health and Human Services until adopted by HHS through a Federal Register Notice. That Notice, which will be published in late 2014, will indicate the date on which the Guidance applies to HHS grant funds. Until that time HRSA grantees must comply with the requirements in the current circulars listed above.”

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
Section A: Limitation on Uses of Part A funding				
1. Adherence to 10% limit on proportion of federal funds spent on	<ul style="list-style-type: none"> • Identification and description of all expenses within grantee budget that are 	<ul style="list-style-type: none"> • Identify and appropriately categorize administrative expenses and ensure that 	N/A	PHS ACT 2612 A 2604(h)(1)

¹ All statutory citations are to title XXVI of the Public Health Service Act, 42 U.S.C. § 300ff-11 et seq, and are abbreviated with “PHS ACT XXXX” and the section reference.

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
administrative costs in any given grant year. <ul style="list-style-type: none"> For grantees <u>without</u> a fiduciary intermediary or administrative agent 	categorized as administrative costs <ul style="list-style-type: none"> Documentation that administrative expenses do not exceed 10% of the awarded Ryan White grant 	they do not exceed 10% of total grant <ul style="list-style-type: none"> Provide HRSA/HAB with current operating budgets with sufficient detail to determine and review administrative expenses 		
2. Adherence to 10% limit on grantee's and administrative or fiscal agent's combined administrative costs for management of the Part A grant <ul style="list-style-type: none"> For grantees <u>with</u> a fiduciary intermediary or administrative agent 	<ul style="list-style-type: none"> Documentation of administrative costs within both grantee and fiscal agent budgets Documentation that combined administrative expenses do not exceed 10% of the awarded Ryan White grant 	Review the grantee and administrative/fiscal agent budgets and calculate the total amount of administrative expenses.	N/A	PHS ACT 2604(h)(1) Part A Manual
3. Use of grantee administrative funds only for allowable expenditures	Review of grantee budget to determine that all administration expenditures are allowable under HAB guidelines, based on the following list of allowable administrative activities: <ul style="list-style-type: none"> Routine grant administration and monitoring activities, including the development of applications and the receipt and disbursement of program funds Development and establishment of 	Provide to HRSA current operating budgets and allocation expense reports with sufficient detail to review administrative expenses		PHS ACT 2604(h)(3) Part A Manual

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
	reimbursement and accounting systems <ul style="list-style-type: none"> • Preparation of routine programmatic and financial reports • Compliance with grant conditions and audit requirements • All activities associated with the grantee's contract award procedures, including the activities carried out by the HIV health services Planning Council (PC) • Development of requests for proposals, subgrantee and contract proposal review activities, negotiation and awarding of contracts • Monitoring activities including telephone consultation, written documentation, and onsite visits • Reporting on contracts, and funding reallocation activities • Indirect costs 			
4. Aggregated subgrantee administrative expenses total not more than 10% of Part A service dollars	<ul style="list-style-type: none"> • Review of subgrantee budgets to ensure proper designation and categorization of administrative costs • Calculation of the 	Maintain file documentation on all subgrantees including their current operating budgets and expense/ allocation reports, with sufficient detail to identify and calculate administrative	Prepare project budget and track expenses with sufficient detail to allow identification of administrative expenses	PHS ACT 2604(h)(2) Part A Manual Harold Phillips & Steven Young

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
	administrative costs for each subgrantee <ul style="list-style-type: none"> • Calculation of the total amount of administrative expenses across all subgrantees to ensure that the aggregate administrative costs do not exceed 10% 	expenses		Letter, 7/17/2012 http://hab.hrsa.gov/manageyourgrant/files/rent2013.pdf
5. Appropriate subgrantee assignment of Ryan White Part A administrative expenses, with administrative costs to include: <ul style="list-style-type: none"> • Usual and recognized overhead activities, including rent, utilities, and facility costs • Costs of management oversight of specific programs funded under this title, including program coordination; clerical, financial, and management staff not directly related to patient care; program evaluation; liability insurance; audits; computer hardware/software not directly related to patient care 	Review of subgrantee administrative budgets and expenses to ensure that all expenses are allowable	<ul style="list-style-type: none"> • Obtain and keep on file current subgrantee operating budgets with sufficient detail to review program and administrative expenses and ensure appropriate categorization of costs • Review expense reports to ensure that all administrative costs are allowable 	<ul style="list-style-type: none"> • Prepare project budget that meets administrative cost guidelines • Provide expense reports that track administrative expenses with sufficient detail to permit review of administrative cost elements 	PHS ACT 2604(h)(1-4) Harold Phillips & Steven Young Letter, 7/17/2012 http://hab.hrsa.gov/manageyourgrant/files/rent2013.pdf CFR Part 215

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>6. Inclusion of Indirect costs (capped at 10%) only where the grantee has a certified HHS-negotiated indirect cost rate using the Certification of Cost Allocation Plan or Certificate of Indirect Costs, which has been reviewed by the HRSA/HAB Project Officer</p> <p>Note: To obtain an indirect cost rate through HHS's Division of Cost Allocation (DCA), visit their website at: http://rates.psc.gov/</p>	<p>For grantee wishing to include an indirect rate, documentation of a current Certificate of Cost Allocation Plan or Certificate of Indirect Costs that is HHS-negotiated, signed by an individual at a level no lower than chief financial officer of the governmental unit that submits the proposal or component covered by the proposal, and reviewed by the HRSA/HAB Project Officer</p>	<ul style="list-style-type: none"> File with HRSA/HAB a current approved HHS-negotiated indirect rate for the grantee Where a subgrantee plans to use Ryan White funds for indirect costs, maintain on file the documented HRSA-approved subgrantee indirect cost rate Review subgrantee budgets and expense reports to determine the use of the indirect cost rate and adherence to the 10% administration cap Review subgrantee budgets to ensure no duplication of cost covered in indirect rate and other line item expenses 	<ul style="list-style-type: none"> If using indirect cost as part or all of its 10% administration costs, obtain and keep on file a federally approved HHS-negotiated Certificate of Cost Allocation Plan or Certificate of Indirect Costs Submit a current copy of the Certificate to the grantee 	<p>² CFR 225, Appendix A, section F</p> <p>Funding Opportunity Announcement</p>
<p>7. Total clinical quality management costs for the EMA or TGA do not exceed 5% of the annual Ryan White Part A grant or \$3 million, whichever is less</p>	<p>Review of grantee budget and expenditures to determine clinical quality management costs</p>	<ul style="list-style-type: none"> Provide a budget to HRSA that separately identifies all clinical quality management costs Separately track costs associated with clinical quality management 	<p>N/A</p>	<p>PHS ACT 2604(h)(5)</p>
<p>8. Expenditure of not less</p>	<ul style="list-style-type: none"> Review of budgeted 	<ul style="list-style-type: none"> Monitor program 	<p>Report to the grantee</p>	<p>PHS ACT 2604(c)</p>

² References to the Code of Federal Regulations will be abbreviated as "CFR" throughout this document

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>than 75% of service dollars on core medical services, unless a waiver has been obtained from HRSA (Service dollars are those grant funds remaining after removal of administrative and clinical quality management funds)</p>	<p>allocations and actual program expenses to verify that the grantee has met or exceeded the required 75% expenditure on HRSA-defined core medical services</p>	<p>allocations, subgrant agreements, actual expenditures, and reallocations throughout the year to ensure 75% percent of program funds are expended for HRSA-defined core medical services</p> <ul style="list-style-type: none"> • Require subgrantee monitoring and financial reporting that documents expenditures by program service category • Maintain budgets and funding allocations, subgrantee award information, and expenditure data with sufficient detail to allow for the tracking of core medical services expenses • Grantees may request a core services waiver. 	<p>expenses by service category</p>	<p>Notice of Award</p> <p>HAB Policy Notice 08-02</p>
<p>9. Total expenditures for support services limited to no more than 25% of service dollars. Support services are those services, subject to approval of the Secretary of Health and</p>	<ul style="list-style-type: none"> • Documentation that support services are being used to help achieve positive medical outcomes for clients • Documentation that aggregated support service expenses do not exceed 25% of service funds 	<ul style="list-style-type: none"> • Document and assess the use of support service funds to demonstrate that they are contributing to positive medical outcomes for clients • Monitor program allocations, subgrant 	<ul style="list-style-type: none"> • Report to the grantee expenses by service category • Document that support service funds are contributing to positive medical outcomes for clients 	<p>PHS ACT 2604(d)</p>

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Human Services, that are needed for individuals with HIV/AIDS to achieve their medical outcomes.		agreements, actual expenditures, and reallocations throughout the year to ensure that no more than 25% percent of program funds are expended for HHS-approved support services <ul style="list-style-type: none"> • Require subgrantee monitoring and financial reporting that documents expenditures by program service category • Maintain budgets and funding allocations, subgrantee award information, and expenditure data with sufficient detail to allow for the tracking of support service expenses 		
Section B: Unallowable Costs				
1. The grantee shall provide to all Part A subgrantees definitions of unallowable costs	<ul style="list-style-type: none"> • Signed contracts, grantee and subgrantee assurances, and/or certifications that define and specifically forbid the use of Ryan White funds for unallowable expenses 	<ul style="list-style-type: none"> • Document receipt of the Notice of Award and maintain a file of signed assurances • Have signed certifications and disclosure forms for any subgrantee receiving 	<ul style="list-style-type: none"> • Maintain a file with signed subgrant agreement, assurances, and/or certifications that specify unallowable costs • Ensure that budgets do 	PHS ACT 2684 PHS ACT 2604(i) Notice of Award HAB Policy Notice 07-06

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
	<p>Note: Unallowable costs are listed in the Universal Monitoring Standards</p> <ul style="list-style-type: none"> Grantee review of subgrantee budgets and expenditures to ensure that they do not include any unallowable costs 	<p>more than \$100,000 in direct funding</p> <ul style="list-style-type: none"> Include definitions of unallowable costs in all subgrantee requests for proposals, subgrant agreements, purchase orders, and requirements or assurances Include in financial monitoring a review of subgrantee expenses to identify any unallowable costs Require subgrantee budgets and expense reports with sufficient budget justification and expense detail to document that they do not include unallowable costs 	<p>not include unallowable costs</p> <ul style="list-style-type: none"> Ensure that expenditures do not include unallowable costs Provide budgets and financial expense reports to the grantee with sufficient detail to document that they do not include unallowable costs 	<p>45 CFR 93</p> <p>HAB Policy Notice 10-02</p> <p>Part A Manual</p> <p>HHS Grants Policy Statement</p>
<p>2. No use of Part A funds to purchase or improve land, or to purchase, construct, or permanently improve any building or other facility (other than minor remodeling)</p>	<p>Implementation of actions specified in B.1 above</p>	<p>Carry out actions specified in B.1 above</p>	<p>Carry out subgrantee actions specified in B.1 above</p>	<p>PHS ACT 2604(i)</p>
<p>3. No cash payments to service recipients</p>	<ul style="list-style-type: none"> Implementation of actions specified in B.1. above Review of policies and 	<ul style="list-style-type: none"> Carry out actions specified in B.1. above Ensure that policies and 	<ul style="list-style-type: none"> Carry out subgrantee actions specified in B.1. above 	<p>PHS ACT 2604(i)</p> <p>Notice of Award</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>Note: A cash payment is the use of some form of currency (paper or coins). Gift cards have an expiration date; therefore they are not considered to be cash payments.</p>	<p>procedures for service categories involving payments made on behalf of individuals to ensure that no direct payments are made to individuals (e.g., emergency financial assistance, transportation, health insurance premiums, medical or medication co-pays and deductibles, food and nutrition)</p> <ul style="list-style-type: none"> Review of expenditures by subgrantees to ensure that no cash payments were made to individuals 	<p>procedures for service categories involving payments made on behalf of clients prohibit cash payments to service recipients</p>	<ul style="list-style-type: none"> Maintain documentation of policies that prohibit use of Ryan White funds for cash payments to service recipients 	<p>HAB Policy Notice 10-02</p>
<p>4. No use of Part A funds to develop materials designed to promote or encourage intravenous drug use or sexual activity, whether homosexual or heterosexual</p>	<p>Implementation of actions specified in B.1 above</p>	<p>Carry out actions specified in B.1 above</p>	<p>Carry out subgrantee actions specified in B.1 above</p>	<p>PHS ACT 2684</p>
<p>5. No use of Part A funds for the purchase of vehicles without written Grants Management Officer (GMO) approval</p>	<ul style="list-style-type: none"> Implementation of actions specified in B.1. above Where vehicles were purchased, review of files for written permission from GMO 	<ul style="list-style-type: none"> Carry out actions specified in B.1 above If any vehicles were purchased, maintain file documentation of permission of GMO to purchase a vehicle 	<ul style="list-style-type: none"> Carry out subgrantee actions specified in B.1 above If vehicle purchase is needed, seek grantee assistance in obtaining written GMO approval and maintain document in file 	<p>Notice of Award</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>6. No use of Part A funds for:</p> <ul style="list-style-type: none"> • Non-targeted marketing promotions or advertising about HIV services that target the general public (poster campaigns for display on public transit, TV or radio public service announcements, etc.) • Broad-scope awareness activities about HIV services that target the general public 	<ul style="list-style-type: none"> • Implementation of actions specified in B.1. above • Review of program plans, budgets, and budget narratives for marketing, promotions and advertising efforts, to determine whether they are appropriately targeted to geographic areas and/or disproportionately affected populations rather than targeting the general public 	<ul style="list-style-type: none"> • Carry out actions specified in B.1. above • Review program plans and budget narratives for any marketing or advertising activities to ensure that they do not include unallowable costs 	<ul style="list-style-type: none"> • Carry out subgrantee actions specified in B.1. above • Prepare a detailed program plan and budget narrative that describe planned use of any advertising or marketing activities 	<p>Notice of Award</p>
<p>7. No use of Part A funds for outreach activities that have HIV prevention education as their exclusive purpose</p>	<ul style="list-style-type: none"> • Implementation of actions specified in B.1. above • Review of program plans, budgets, and budget narratives for outreach activities that have HIV prevention education as their exclusive purpose 	<ul style="list-style-type: none"> • Carry out actions specified in B.1. above • Require a detailed narrative program plan of outreach activities from subgrantees and contractors to ensure that their purpose goes beyond HIV prevention education to include testing and early entry into care 	<ul style="list-style-type: none"> • Carry out subgrantee actions specified in B.1. above • Provide a detailed program plan of outreach activities that demonstrates how the outreach goes beyond HIV prevention education to include testing and early entry into care 	<p>HAB Policy Notice 07-06</p> <p>Part A Manual</p>
<p>8. No use of Part A funds for influencing or attempting to influence members of Congress and other Federal personnel</p>	<ul style="list-style-type: none"> • Implementation of actions specified in B.1. above • Review of lobbying certification and disclosure forms for both the grantee and subgrantees 	<ul style="list-style-type: none"> • Carry out actions specified in B.1. above • File a signed “Certification Regarding Lobbying”, and, as appropriate, a “Disclosure of Lobbying 	<ul style="list-style-type: none"> • Carry out subgrantee actions specified in B.1. above • Include in personnel manual and employee orientation information 	<p>45 CFR 93</p> <p>Notice of Award</p>

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	<p>Note: Forms can be obtained from the CFR website: http://ecfr.gpoAccess.gov</p>	<p>Activities”</p> <ul style="list-style-type: none"> • Ensure that subgrantee staff are familiar and in compliance with prohibitions on lobbying with federal funds 	<p>on regulations that forbid lobbying with federal funds</p>	
<p>9. No use of Part A funds for foreign travel</p>	<p>Implementation of actions specified in B.1 above</p> <ul style="list-style-type: none"> • Review of program plans, budgets, and budget narratives for foreign travel 	<ul style="list-style-type: none"> • Carry out actions specified in B.1 above • Request a detailed narrative from subgrantees on budgeted travel 	<ul style="list-style-type: none"> • Carry out subgrantee actions specified in B.1 above • Maintain a file documenting all travel expenses paid by Part A funds 	<p>Notice of Award</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>Section C: Income from Fees for Services Performed</p>				
<p>1. Use of Part A and other funding sources to maximize program income from third party sources and ensure that Ryan White is the payer of last resort. Third party funding sources include:</p> <ul style="list-style-type: none"> • Medicaid • State Children’s Health Insurance Programs (SCHIP) • Medicare (including the Part D prescription drug benefit) and • Private insurance 	<ul style="list-style-type: none"> • Information in client records that includes proof of screening for insurance coverage • Documentation of policies and consistent implementation of efforts to enroll all eligible uninsured clients into Medicare, Medicaid, private health insurance or other programs • Documentation of procedures for coordination of benefits by grantee and subgrantees 	<p>Establish and implement a process to ensure that subgrantees are maximizing third party reimbursements, including:</p> <ul style="list-style-type: none"> • Requirement in subgrant agreement or through another mechanism that subgrantees maximize and monitor third party reimbursements • Requirement that subgrantees document in client records how each client has been screened for and enrolled in eligible programs • Monitoring to determine that Ryan White is serving as the payer of last resort, including review of client records and documentation of billing and collection policies and procedures. and information on third party contracts 	<ul style="list-style-type: none"> • Have policies and staff training on the requirement that Ryan White be the payer of last resort and how that requirement is met • Require that each client be screened for insurance coverage and eligibility for third party programs, and helped to apply for such coverage, with documentation of this in client records • Carry out internal reviews of files and billing system to ensure that Ryan White resources are used only when a third party payer is not available • Establish and maintain medical practice management systems for billing 	<p>PHS ACT 2605(a)(6)</p> <p>Funding Opportunity Announcement</p>
<p>2. Ensure billing and collection from third</p>	<ul style="list-style-type: none"> • Inclusion in subgrant agreements of language that 	<ul style="list-style-type: none"> • Include provisions in subgrant agreements that 	<p>Establish and consistently implement:</p>	<p>PHS ACT 2605(a)(6)</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
party payers, including Medicare and Medicaid, so that payer of last resort requirements are met	<ul style="list-style-type: none"> • requires billing and collection of third party funds • Review of the following subgrantee systems and procedures: <ul style="list-style-type: none"> ○ Billing and collection policies and procedures ○ Electronic or manual system to bill third party payers ○ Accounts receivable system for tracking charges and payments for third party payers 	<ul style="list-style-type: none"> • require billing and collection of third party funds • Where appropriate, require reports from subgrantees on collections from third party payers • Where the grantee is a provider of billable services, carry out same direct efforts as subgrantees 	<ul style="list-style-type: none"> • Billing and collection policies and procedures • Billing and collection process and/or electronic system • Documentation of accounts receivable 	Funding Opportunity Announcement
3. Ensure subgrantee participation in Medicaid and certification to receive Medicaid payments.	<ul style="list-style-type: none"> • Review of subgrantee's/ provider's individual or group Medicaid number • If subgrantee is not currently certified to receive Medicaid payments, documentation of efforts under way to obtain documentation and expected timing 	<ul style="list-style-type: none"> • Maintain documentation of subgrantee Medicaid certification • Ensure that where subgrantees that are not certified maintain documentation of efforts under way to obtain documentation and expected timing. 	<ul style="list-style-type: none"> • Document and maintain file information on grantee or individual provider agency Medicaid status • Maintain file of contracts with Medicaid insurance companies • If no Medicaid certification, document current efforts to obtain such certification • If certification is not feasible, request a waiver where appropriate 	PHS ACT 2604(g)
4. Ensure billing, tracking, and reporting of	<ul style="list-style-type: none"> • Review of subgrantee billing, tracking, and 	<ul style="list-style-type: none"> • Monitor subgrantees to ensure appropriate billing 	Bill, track, and report to the grantee all program billed	45 CFR 74.24 and 92.25

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>program income by grantee and subgrantees</p>	<p>reporting of program income,</p> <ul style="list-style-type: none"> Review of program income reported by the grantee in the FFR and annual reports 	<p>and tracking of program income, Require subgrantee reporting of program income</p>	<p>and obtained</p>	<p>2 CFR 215.24</p>
<p>5. Ensure service provider retention of program income derived from Ryan White-funded services and use of such funds in one or more of the following ways:</p> <ul style="list-style-type: none"> Funds added to resources committed to the project or program, and used to further eligible project or program objectives Funds used to cover program costs <p>Note: Program income funds are not subject to the federal limitations on administration (10%), quality management (5%), or core medical services (75% minimum). For example, all program income can be spent on administration of the Part A</p>	<ul style="list-style-type: none"> Review of grantee and subgrantee systems for tracking and reporting program income generated by Ryan White-funded services Review of expenditure reports from subgrantees regarding collection and use of program income Monitoring of medical practice management system to obtain reports of total program income derived from Ryan White Part A activities 	<ul style="list-style-type: none"> Monitor subgrantee receipt and use of program income to ensure use for program activities Report aggregate program income in the FFR and annual data report Provide a report detailing the expenditure of program income by each subgrantee 	<ul style="list-style-type: none"> Document billing and collection of program income. Report program income documented by charges, collections, and adjustment reports or by the application of a revenue allocation formula 	<p>45 CFR 74.24 and 92.25</p> <p>2 CFR 215.24</p> <p>Funding Opportunity Announcement</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
program, however HRSA does encourage funds be used for services.				
Section D: Imposition & Assessment of Client Charges				
<p>1. Ensure grantee and subgrantee policies and procedures require a publicly posted schedule of charges (e.g. sliding fee scale) to clients for services, which may include a documented decision to impose only a nominal charge</p> <p>Note: This expectation applies to grantees that also serve as direct service providers</p>	<p>Review of subgrantee policies and procedures, to determine:</p> <ul style="list-style-type: none"> • Existence of a provider policy for a schedule of charges. A publically posted schedule of charges based on current Federal Poverty Level (FPL) including cap on charges • Client eligibility for imposition of charges based on the schedule. • Track client charges made and payments received • How accounting systems are used for tracking charges, payments, and adjustments 	<ul style="list-style-type: none"> • Review subgrantees: <ul style="list-style-type: none"> ○ policy for a schedule of charges Client eligibility determination procedures for imposition of charges based on the schedule Description of accounting system used for tracking patient charges, payments, and adjustments • If providing direct services, meet same requirements as subgrantees 	<p>Establish, document, and have available for review:</p> <ul style="list-style-type: none"> • policy for a schedule of charges Current schedule of charges • Client eligibility determination in client records • Fees charged by the provider and the payments made to that provider by clients • Process for obtaining, and documenting client charges and payments through an accounting system, manual or electronic 	PHS ACT 2605(e)
<p>2. No charges imposed on clients with incomes below 100% of the Federal Poverty Level (FPL)</p>	<p>Review of provider policy for schedule of charges to ensure clients with incomes below 100% of the FPL are not charged for services</p>	<ul style="list-style-type: none"> • Review subgrantee eligibility determination procedures and ensure that clients with incomes below 100% of the FPL are not to 	<p>Document that:</p> <ul style="list-style-type: none"> • policy for schedule of charges does not allow clients below 100% of FPL to be charged for 	PHS ACT 2605(e)

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
		be charged for services <ul style="list-style-type: none"> Review client records and documentation of actual charges and payments to ensure that the policy is being correctly and consistently enforced and clients below 100% of FPL are not being charged for services 	services <ul style="list-style-type: none"> Personnel are aware of and consistently following the policy for schedule of charges Policy for schedule of charges must be publically posted 	
3. Charges to clients with incomes greater than 100% of poverty are determined by the schedule of charges. Annual limitation on amounts of charge (i.e. caps on charges) for Ryan White services are based on the percent of client's annual income, as follows: <ul style="list-style-type: none"> 5% for clients with incomes between 100% and 200% of FPL 7% for clients with incomes between 200% and 300% of FPL 10% for clients with incomes greater than 300% of FPL 	<ul style="list-style-type: none"> Review of policy for schedule of charges and cap on charges Review of accounting system for tracking patient charges and payments Review of charges and payments to ensure that charges are discontinued once the client has reached his/her annual cap. 	<ul style="list-style-type: none"> Review subgrantee policy for schedule of charges and cap on charges , to ensure that they meet legislative requirements Review accounting system and records of charges and payments to ensure compliance with caps on charges Review client records for eligibility determination application to ensure consistency with policies and federal requirements 	Establish and maintain a schedule of charges t policy that includes a cap on charges and the following: <ul style="list-style-type: none"> responsibility for client eligibility determination to establish individual fees and caps Tracking of Part A charges or medical expenses inclusive of enrollment fees, deductibles, co-payments, etc. A process for alerting the billing system that the client has reached the cap and should not be further charged for the remainder of the year Personnel are aware of 	PHS ACT 2605(e)(1)

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
			and consistently following the policy for schedule of charges and cap on charges.	
Section E: Financial Management				
<p>1. Compliance by grantee with all the established requirements in the Code of Federal Regulations (CFR) for (a) state and local governments; and (b) non-profit organizations, hospitals, commercial organizations and institutions of higher education. Included are for:</p> <ul style="list-style-type: none"> • Payments for services • Program income • Revision of budget and program plans • Non-federal audits • Property standards, including insurance coverage, equipment, supplies, and other expendable property 	<ul style="list-style-type: none"> • Review of grantee and subgrantee accounting systems to verify that they are sufficient and have the flexibility to operate the federal grant program and meet federal requirements • Review of the grantee's systems to ensure capacity to meet requirements with regard to: <ul style="list-style-type: none"> ○ Payment of subgrantee contractor invoices ○ Allocation of expenses of subgrantees among multiple funding sources • Review of grantee and subgrantee: <ul style="list-style-type: none"> ○ Financial operations policies and procedures ○ Purchasing and procurement policies and procedures ○ Financial reports 	<ul style="list-style-type: none"> • Ensure access to and review: <ul style="list-style-type: none"> ○ Subgrantee accounting systems, electronic spreadsheets, general ledger, balance sheets, income and expense reports, and all other financial activity reports ○ All financial policies and procedures, including billing and collection policies and purchasing and procurement policies ○ Accounts payable systems and policies. • Ensure that subgrantee agreements require the availability of records for use by grantee auditors, staff, and federal government agencies • Include in subgrant 	<p>Provide grantee personnel access to:</p> <ul style="list-style-type: none"> • Accounting systems, electronic spreadsheets, general ledger, balance sheets, income and expense reports and all other financial activity reports of the subgrantee • All financial policies and procedures, including billing and collection policies and purchasing and procurement policies • Accounts payable systems and policies 	<p>45 CFR 74 (for non-profits organizations)</p> <p>45 CFR 92 (for state and local governments)</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<ul style="list-style-type: none"> • Procurement standards, including recipient responsibilities, codes of conduct, competition, procurement procedures, cost and price analysis, and procurement records. • Reports and records, including monitoring and reporting, program performance, financial reports, and retention and access requirements • Termination and enforcement and closeout procedures 	<ul style="list-style-type: none"> • Review of subgrantee contract and correspondence files • Review of grantee’s process for reallocation of funds by service category and subgrantee • Review of grantee’s FFR trial worksheets and documentation 	<p>agreements required compliance with federal standards for financial management (45 CFR 72 & 94 or 2 CFR 215)</p> <ul style="list-style-type: none"> • Review grantee financial systems to ensure the capacity for compliance with all federal regulations, including the FFR, and other required reporting, and make all systems and procedures accessible to federal funding and monitoring agencies 		
<p>2. Comprehensive grantee and subgrantee budgets and reports with sufficient detail to account for Ryan White funds by service category, subgrantee, administrative costs, and (75/25 rule) core medical and support services rules, and to delineate between multiple funding sources and show program income</p>	<p>Review of:</p> <ul style="list-style-type: none"> • Accounting policies and procedures • Grantee and subgrantee budgets • Accounting system used to record expenditures using the specified allocation methodology • Reports generated from the accounting system to determine if the detail and timeliness are sufficient to manage a Ryan White program 	<p>Determine the capacity of grantee and subgrantee:</p> <ul style="list-style-type: none"> • Accounting policies and procedures • Budgets • Accounting system and reports to account for Part A funds in sufficient detail to meet Ryan White fiscal requirements 	<p>Ensure adequacy of agency fiscal systems to generate needed budgets and expenditure reports, including:</p> <ul style="list-style-type: none"> • Accounting policies and procedures • Budgets • Accounting system and reports 	<p>Funding Opportunity Announcement</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>3. Line-item grantee and subgrantee budgets that include at least four category columns:</p> <ul style="list-style-type: none"> • Administrative • Clinical Quality Management (CQM) • HIV Services • MAI 	<ul style="list-style-type: none"> • Review of grantee line-item budget and narrative for inclusion of required forms, categories, and level of detail to assess the funding to be used for administration, CQM, and direct provision of services and the budget's relation to the scope of services • Review of grantee's administrative budget and narrative for inclusion of sufficient Planning Council support funds to cover reasonable and necessary costs associated with carrying out legislatively mandated functions • Review of subgrantee line-item budget to ensure inclusion of required information and level of detail to ensure allowable use of funds and its relation to the proposed scope of services 	<ul style="list-style-type: none"> • Use prescribed form SF-424A when submitting the line-item budget and budget justification • Include the following budget categories in all components of the budget: <ul style="list-style-type: none"> ○ Salaries and fringe benefits for program staff ○ Contractual Services - personnel or services contracted to outside providers, for activities not done in-house ○ Grantee Administration, and Planning Council Support (which must be under the Administrative Category) – capped at 10% • Ensure that Planning Council Support includes sufficient resources to enable completion of legislatively mandated functions • Provide a Budget Justification narrative describing the uses, activities, and basis for the projections of Personnel 	<p>Submit a line-item budget with sufficient detail to permit review and assessment of proposed use of funds for the management and delivery of the proposed services</p>	<p>Funding Opportunity Announcement</p> <p>45 CFR 74.12 and 92.10</p> <p>2 CFR 215.25</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
		Costs, Fringe Benefits, Travel, Equipment, Supplies, Contracts, and Other to accompany the line-item budget <ul style="list-style-type: none"> • Include in its provider Request for Proposals and subgrant agreement instructions for the development and submission of provider line-item budgets 		
4. Revisions to approved budget of federal funds that involve significant modifications of project costs made by the grantee only after approval from the HRSA/HAB Grants Management Officer (GMO) Note: A significant modification occurs under a grant where the federal share exceeds \$100,000, when cumulative transfers among direct cost budget categories for the current budget period exceed 25% of the total approved budget (inclusive of direct	<ul style="list-style-type: none"> • Comparison of grantee's current operating budget to the budget approved by the Project Officer • Documentation of written GMO approval of any budget modifications that exceeds the required threshold 	<ul style="list-style-type: none"> • Where a budget modification requires HRSA/HAB approval, request the revision in writing to the Grants Management Officer (GMO) • Consider the approval official only when it has been signed by the GMO • Include in subgrantee agreements specification of which budget revisions require approval, and provide written instructions on the budget revision process 	Document all requests for and approvals of budget revisions	45 CFR 74.25 and 92.30 2 CFR 215.25 (b) Notice of Award

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<p>and indirect costs and federal funds and required matching or cost sharing) for that budget period or \$250,000, whichever is less. Even if a grantee's proposed re-budgeting of costs fall below the significant re-budgeting threshold identified above, grantees are still required to request prior approval, if some or all of the re-budgeting reflects either of the following:</p> <ul style="list-style-type: none"> • A change in scope • A proposed purchase of a unit of equipment exceeding \$25,000 (if not included in the approved application) 				
<p>5. Expenditure of Ryan White Part A program service funds consistent with the service priorities and fund allocations to specific service categories (both core medical and support services) established by the Planning</p>	<ul style="list-style-type: none"> • Comparison of Planning Council list of service priorities and funding allocations with: <ul style="list-style-type: none"> ○ Grantee budgeted amounts for each service category ○ Actual contract amounts by service category • Review the Part A program's policies for reallocation 	<ul style="list-style-type: none"> • Ensure the Part A program services budget submitted to HRSA/HAB includes the fund allocations to service categories established by the Planning Council • Ensure that total subgrant amounts by service category reflect the Planning Council allocations 	N/A	PHS ACT 2603(d)

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Council, and any reallocations of funds approved by the Planning Council	<p>across service categories, as established by the</p> <ul style="list-style-type: none"> • Comparison of actual expenditures by service categories with Planning Council allocations and reallocations consistent with Planning Council policies 	<ul style="list-style-type: none"> • Ensure that any reallocation of funds across service categories reflects compliance with Planning Council reallocation policies and procedures 		
<p>6. Provider subgrant agreements and other contracts meet all applicable federal and local statutes and regulations governing subgrant/contract award and performance</p> <p>Major areas for compliance:</p> <p>a. Follow state law and procedures when awarding and administering subgrants (whether on a cost reimbursement or fixed amount basis)</p> <p>b. Ensure that every subgrant includes any clauses required by federal statute and executive orders and their implementing regulations</p> <p>c. Ensure that subgrant</p>	<p>Develop and review Part A subcontract agreements and contracts to ensure compliance with local and federal requirements</p>	<ul style="list-style-type: none"> • Prepare subgrant agreements/contracts that meet both federal and local contracting requirements and provide specific clauses as stated in the Standard • Maintain file documentation of Part A subgrantee agreements/contracts and Award Letters • Revise subgrant agreements/contracts annually to reflect any changes in federal requirements • Monitor compliance with subgrant provisions 	<ul style="list-style-type: none"> • Establish policies and procedures to ensure compliance with subgrant provisions • Document and report on compliance as specified by the grantee 	<p>45 CFR 74.2 45 CFR 92.37 2 CFR 215.20 definitions</p>

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<p>agreements specify requirements imposed upon subgrantees by federal statute and regulation</p> <p>d. Ensure appropriate retention of and access to records</p> <p>e. Ensure that any advances of grant funds to subgrantees substantially conform to the standards of timing and amount that apply to cash advances by federal agencies</p>				
<p>Section F: Property Standards</p>				
<p>1. Grantee and subgrantee tracking of and reporting on tangible nonexpendable personal property, including exempt property, purchased directly with Ryan White Part A funds and having:</p> <ul style="list-style-type: none"> • A useful life of more than one year, and 	<p>Review to determine that the grantee and each subgrantee has a current, complete, and accurate:</p> <ul style="list-style-type: none"> • Inventory list of capital assets purchased with Ryan White funds • Depreciation schedule that can be used to determine when federal reversionary interest has expired 	<ul style="list-style-type: none"> • Develop and maintain a current, complete, and accurate asset inventory list and depreciation schedule • Ensure that each subgrantee maintains a current, complete, and accurate asset inventory list and depreciation schedule, and that they identify assets purchased 	<ul style="list-style-type: none"> • Develop and maintain a current, complete, and accurate asset inventory list and a depreciation schedule that lists purchases of equipment by funding source • Make the list and schedule available to the grantee upon request 	<p>45 CFR 74.34 45 CFR 92.32 2 CFR 215.34</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<ul style="list-style-type: none"> An acquisition cost of \$5,000 or more per unit (Lower limits may be established, consistent with recipient policies) 		with Ryan White funds		
2. Implementation of adequate safeguards for all capital assets that assure that they are used solely for authorized purposes	<ul style="list-style-type: none"> Review grantee and subgrantee inventory lists of assets purchased with Ryan White funds During monitoring, ensure that assets are available and appropriately registered Review depreciation schedule for capital assets for completeness and accuracy 	<ul style="list-style-type: none"> Carry out the actions specified in F.1 above Ensure effective control over capital assets 	Carry out the actions specified in F.1 above	45 CFR 74.31-37 45 CFR 92.30-37 2 CFR 215.30-37
3. Real property, equipment, intangible property, and debt instruments acquired or improved with federal funds held in trust by grantee and subgrantees, with title of the property vested in the grantee or subgrantee but with the federal government retaining a reversionary interest	<ul style="list-style-type: none"> Implementation of actions specified in F.1. above Review to ensure grantee and subgrantee policies that: <ul style="list-style-type: none"> Acknowledge the reversionary interest of the federal government over property purchased with federal funds Establish that such property may not be encumbered or disposed of without HRSA/HAB approval 	<ul style="list-style-type: none"> Carry out the actions specified in F.1. above Ensure policies and procedures at grantee and subgrantee level stating that while title of property purchased with Ryan White Part A funds is vested in the grantee or subgrantee, the federal government will keep a reversionary interest Ensure policies at the grantee and subgrantee level establish that such property may not be encumbered or disposed 	<ul style="list-style-type: none"> Carry out the actions specified in F.1. above Establish policies and procedures that acknowledge the reversionary interest of the federal government over property improved or purchased with federal dollars Maintain file documentation of these policies and procedures for grantee review 	45 CFR 74.32 45 CFR 92.31 2 CFR 215.32

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
		of without the approval of HRSA/HAB as the HHS awarding agency		
<p>4. Assurance by grantee and subgrantees that:</p> <ul style="list-style-type: none"> Title of federally-owned property remains vested in the federal government If the HHS awarding agency has no further need for the property, it will be declared excess and reported to the General Services Administration 	Implementation of actions specified in F.1 above	Carry out the actions specified in F.1 above	Carry out the actions specified in F.1 above	45 CFR 74.33 45 CFR 92.33 2 CFR 215.33
<p>5. Title to supplies to be vested in the recipient upon acquisition, with the provision that if there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate value upon termination or completion of the program and the supplies are not needed for any other federally-sponsored program, the recipient shall:</p> <ul style="list-style-type: none"> Retain the supplies for 	Review to ensure the existence of an inventory list of supplies including medications purchased with local drug assistance or ADAP funds	<ul style="list-style-type: none"> Develop and maintain a current, complete, and accurate supply and medication inventory list Ensure that subgrantees develop and maintain similar lists and make them available to the grantee on request 	<ul style="list-style-type: none"> Develop and maintain a current, complete, and accurate supply and medication inventory list Make the list available to the grantee upon request 	45 CFR 74.35 45 CFR 92.36 2 CFR 215.35

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>use on non-federally sponsored activities or sell them</p> <ul style="list-style-type: none"> • Compensate the federal government for its share contributed to purchase of supplies 				
<p>Section G: Cost Principles</p>				
<p>1. Payments made to subgrantees for services need to be cost based and relate to Ryan White administrative, quality management, and programmatic costs in accordance with standards cited under OMB Circulars or the Code of Federal Regulations</p>	<p>Review grantee and subgrantee budgets and expenditure reports to determine whether use of funds is consistent with OMB and CFR cost principles</p>	<ul style="list-style-type: none"> • Ensure that grantee expenses conform to federal cost principles for cost-reimbursable grants. • Ensure grantee and subgrantee staff familiarity with OMB Circulars A Code of Federal Regulations Ensure that grantee and subgrantee budgets and expenditures conform to OMB and CFR requirements • Include in subgrant agreements a provision requiring compliance with OMB cost principles 	<ul style="list-style-type: none"> • Ensure that budgets and expenses conform to federal cost principles • Ensure fiscal staff familiarity with applicable federal regulations 	<p>2 CFR 225 or OMB Circular A-87</p> <p>2 CFR 230 or OMB Circular A-122</p>
<p>2. Payments made for services to be reasonable, not exceeding costs that would be incurred by a prudent person under</p>	<ul style="list-style-type: none"> • Review subgrantee budgets and expenditure reports to determine costs and identify cost components • When applicable, review unit 	<ul style="list-style-type: none"> • Submit reasonable and accurate budgets and annual expenditure reports • Assess the reasonableness of subgrantee costs by 	<ul style="list-style-type: none"> • Make available to the grantee very detailed information on the allocation and costing of expenses for services provided 	<p>2 CFR 225 or OMB Circular A-87</p> <p>2 CFR 230 or OMB Circular A-</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>the circumstances prevailing at the time the decision was made to incur the costs</p>	<p>cost calculations for reasonableness</p> <ul style="list-style-type: none"> • Review fiscal and productivity reports to determine whether costs are reasonable when compared to level of service provided 	<p>reviewing expenditures and unit cost calculations, looking with particular care at budgets and expenditure reports of subgrantee organizations or organizational divisions that receive most of their financial support from federal sources</p> <ul style="list-style-type: none"> • Review and keep on file the following documentation for each subgrantee: <ul style="list-style-type: none"> ○ Current budget ○ Unit cost agreement and calculation. ○ Fiscal and productivity reports 	<ul style="list-style-type: none"> • Calculate unit costs based on historical data • Reconcile projected unit costs with actual unit costs on a yearly or quarterly basis 	<p>122</p>
<p>3. Written grantee and subgrantee procedures for determining the reasonableness of costs, the process for allocations, and the policies for allowable costs, in accordance with the provisions of applicable Federal cost principles and the terms and conditions of the award</p> <p>Costs are considered to</p>	<ul style="list-style-type: none"> • Review policies and procedures that specify allowable expenditures for administrative costs and programmatic costs • Ensure reasonableness of charges to the Part A program 	<ul style="list-style-type: none"> • Have in place policies to be used in determining allowable costs • Test to determine whether subgrantee costs for services as charged to the program are reasonable and allowable 	<ul style="list-style-type: none"> • Have in place policies and procedures to determine allowable and reasonable costs • Have in place reasonable methodologies for allocating costs among different funding sources and Ryan White categories • Make available policies, procedures, and calculations to the grantee on request 	<p>2 CFR 225 or OMB Circular A-87</p> <p>2 CFR 230 or OMB Circular A-122</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>be reasonable when they do not exceed what would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs</p>				
<p>4. Calculate unit costs by grantees and subgrantees based on an evaluation of reasonable cost of services; financial data must relate to performance data and include development of unit cost information whenever practical</p> <p>Note: When using unit costs for the purpose of establishing fee-for-service charges, the GAAP[†] definition can be used. Under GAAP, donated materials and services, depreciation of capital improvement, administration, and facility</p>	<ul style="list-style-type: none"> • Review unit cost methodology for subgrantee and provider services. • Review budgets to calculate allowable administrative and program costs for each service. 	<p>Include in subgrantee agreements a provision that requires submission of reports that detail performance and allow review of the subgrantee's:</p> <ul style="list-style-type: none"> • Budget • Cost of services • Unit cost methodology. 	<p>Have in place systems that can provide expenses and client utilization data in sufficient detail to determine reasonableness of unit costs</p>	<p><i>Determining the Unit Cost of Services</i> (HRSA publication)</p> <p>2 CFR 225 or OMB Circular A-87</p> <p>2 CFR 230 or OMB Circular A-122</p>

† GAAP = Generally Accepted Accounting Principles

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>costs are allowed when determining cost.</p> <ul style="list-style-type: none"> If unit cost is the method of reimbursement, it can be derived by adding direct program costs and allowable administrative costs, capped at 10%, and dividing by number of units of service to be delivered. 				
<p>5. Requirements to be met in determining the unit cost of a service:</p> <ul style="list-style-type: none"> Unit cost not to exceed the actual cost of providing the service Unit cost to include only expenses that are allowable under Ryan White requirements Calculation of unit cost to use a formula of allowable administrative costs plus allowable program costs divided by number of units to be provided 	<ul style="list-style-type: none"> Review methodology used for calculating unit costs of services provided Review budgets to calculate allowable administrative and program costs for each service 	<ul style="list-style-type: none"> Review subgrantee unit cost methodology Review grantee budget components to ensure that all expense categories are allowable under Ryan White 	<ul style="list-style-type: none"> Have in place systems that can provide expenses and client utilization data in sufficient detail to calculate unit cost Have unit cost calculations available for grantee review 	<p><i>Determining the Unit Cost of Services (HRSA publication)</i></p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
Section H: Auditing Requirements				
1. Recipients and sub-recipients of Ryan White funds that are institutions of higher education or other non-profit organizations (including hospitals) are subject to the audit requirements contained in the Single Audit Act Amendments of 1996 (31 USC 7501–7507) and revised OMB Circular A-133, with A-133 audits required for all grantees and subgrantees receiving more than \$500,000 per year in federal grants	<ul style="list-style-type: none"> • Review requirements for subgrantee audits • Review most recent audit (which may be an A-133 audit) to assure it includes: <ul style="list-style-type: none"> ○ List of federal grantees to ensure that the Ryan White grant is included ○ Programmatic income and expense reports to assess if the Ryan White grant is included • Review audit management letter if one exists • Review all programmatic income and expense reports for payer of last resort verification by auditor 	<ul style="list-style-type: none"> • Include in subgrant agreement a requirement for a timely annual audit and associated management letter (an A-133 audit if federal grants total more than \$500,000) • Maintain file documentation of subgrantee audits and management letters • Review audits to ensure inclusion of Ryan White funding • Review audit management letter to determine any material weaknesses • Review audit for income and expense reports testing of payer of last resort verification 	<ul style="list-style-type: none"> • Conduct a timely annual audit (an agency audit or an A-133 audit, depending on amount of federal funds) • Request a management letter from the auditor • Submit the audit and management letter to the grantee • Prepare and provide auditor with income and expense reports that include payer of last resort verification 	<p>45 CFR 74.26 45 CFR 92.26 2 CFR 215.26</p> <p>OMB Circular A-133</p> <p>Steven Young & Heather Hauck Letter 09/20/12</p> <p>http://hab.hrsa.gov/manageyourgrant/files/subgrantaudit.pdf</p>
2. Based on criteria established by the grantee, subgrantees or sub-recipients of Ryan White funds that are small programs (i.e. receive less than \$500,000 per year in	<ul style="list-style-type: none"> • Review requirements for “small program” subgrantee audits • Review most recent audit (which may be an A-133 audit) to determine if it includes: <ul style="list-style-type: none"> ○ List of federal grantees 	<ul style="list-style-type: none"> • Include a statement in agreements with small program subgrantees (i.e. those receiving less than \$500,000 in federal grants) that they may be subject to an annual A-133 audit. • Establish criteria for 	<ul style="list-style-type: none"> • Prepare and provide auditor with financial and other documents required to conduct a major program audit (e.g. income and expense reports that include payer of last 	<p>OMB Circular A-133</p> <p>Steven Young & Heather Hauck Letter 09/20/12</p> <p>http://hab.hrsa.gov/manageyourgrant</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>federal grants) may be subject to audit as a major program (i.e. a program that receives more than \$500,000 in aggregate federal funding) pursuant to OMB Circular 1-133, Section .215 c).</p>	<p>and determine if the Ryan White grant is included</p> <ul style="list-style-type: none"> ○ Programmatic income and expense reports to assess if the Ryan White grant is included ● Review audit management letter <p>Review all programmatic income and expense reports for payer of last resort verification by auditor</p>	<p>determining when a small program subgrantee will be subject to a major program audit (i.e. an A-133 audit).</p> <ul style="list-style-type: none"> ● When requiring an audit as a major program, give the auditee (i.e. the subgrantee) 180 days' notice before their fiscal year end ● Select an auditor based on grantee policies and procedures for auditor selection ● Pay for the audit with grant funds from the grantee's administrative budget ● Maintain file documentation of subgrantee audits and management letters ● Request a management letter from the auditor and review to determine if there are any material weaknesses. ● Review audit for income and expense reports testing of payer of last resort verification 	<p>resort verification, timesheets, general ledger, etc.)</p> <ul style="list-style-type: none"> ● Comply with contract audit requirements on a timely basis 	<p>/files/subgrantaudit.pdf</p>
<p>3. Selection of auditor to be based on Audit Committee for Board of Directors (if non-profit)</p>	<p>Review subgrantee financial policies and procedures related to audits and selection of an auditor</p>	<ul style="list-style-type: none"> ● Ensure financial policies and procedures in place for auditor selection ● Ensure that subgrantees 	<ul style="list-style-type: none"> ● Have in place financial policies and procedures that guide selection of an auditor 	<p>45 CFR 74.26 45 CFR 92.26 2 CFR 215.26</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
policy and process		have policies and procedures in place to select an auditor	<ul style="list-style-type: none"> • Make the policies and procedures available to grantee on request 	OMB Circular A-133
4. Review of audited financial statements to verify financial stability of organization	Review Statement of Financial Position/Balance Sheet, Statement of Activities/Income and Expense Report, Cash Flow Statement, and Notes included in audit to determine organization's financial stability	Review subgrantee audited financial statements and notes to determine the organization's financial status and stability	<ul style="list-style-type: none"> • Comply with contract audit requirements on a timely basis • Provide audit to grantee on a timely basis 	OMB Circular A-133
5. A-133 audits to include statements of conformance with financial requirements and other federal expectations	Review statements of internal controls and federal compliance in A-133 audits	Annually review statements of internal controls and federal compliance in subgrantee A-133 audits to determine compliance with federal expectations	<ul style="list-style-type: none"> • Comply with contract audit requirements on a timely basis • Provide audit to grantee on a timely basis 	OMB Circular A-133
6. Grantees and subgrantees expected to note reportable conditions from the audit and provide a resolution.	<ul style="list-style-type: none"> • Review of reportable conditions • Determination of whether they are significant and whether they have been resolved • Development of action plan to address reportable conditions that have not been resolved 	<ul style="list-style-type: none"> • Annually review subgrantee audits for reportable conditions • Obtain and review subgrantee agency responses to audit findings • Require corrective action if reportable conditions have not been resolved 	<ul style="list-style-type: none"> • Comply with contract audit requirements on a timely basis • Provide grantee the agency response to any reportable conditions 	OMB Circular A-133
Section I: Matching or Cost-Sharing Funds				
1. Grantees required to	<ul style="list-style-type: none"> • Review grantee annual 	<ul style="list-style-type: none"> • Report to HRSA/HAB on 	Where subgrantee on	

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>report to HRSA/HAB information regarding the portion of program costs that are not borne by the federal government</p> <p>Grantees expected to ensure that non-federal contributions:</p> <ul style="list-style-type: none"> • Are verifiable in grantee records • Are not used as matching for another federal program • Are necessary for program objectives and outcomes • Are allowable • Are not part of another federal award contribution (unless authorized) • Are part of the approved budget • Are part of unrecovered indirect cost (if applicable) • Are apportioned in accordance with appropriate federal cost principles • Include volunteer 	<p>comprehensive budget</p> <ul style="list-style-type: none"> • Review all grantee in-kind and other contributions to Ryan White program • Review grantee documentation of other contributed services or expenses 	<p>the non-federal funds or in-kind resources the EMA/TGA is allocating to the program</p> <ul style="list-style-type: none"> • Ensure that the non-federal contribution meets all the requirements stated in the Standard in Column 1 	<p>behalf of the grantee provides matching or cost sharing funds, follow the same verification process as the grantee</p>	<p>45 CFR 74.23 45 CFR 92.24 2 CFR 215.27</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>services, if used, that are an integral and necessary part of the program, with volunteer time allocated value similar to amounts paid for similar work in the grantee organization</p> <ul style="list-style-type: none"> • Value services of contractors at the employees' regular rate of pay plus reasonable, allowable and allocable fringe benefits • Assign value to donated supplies that are reasonable and do not exceed the fair market value • Value donated equipment, buildings, and land differently according to the purpose of the award • Value donated property in accordance with the usual accounting policies of the recipient (not to exceed fair market value) 				

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
Section J: Maintenance of Effort				
1. Part A grantees are required to meet maintenance of effort (MOE) requirements: as a Condition of Award, EMA/TGA political subdivision expenditures for HIV-related core medical services and support services to be maintained at a level equal to their level during the one-year period preceding the fiscal year (FY) for which the grantee is applying to receive a Part A grant	<ul style="list-style-type: none"> • Review core medical services and support service budget elements that document the contributions of the EMA/TGA. • Review tracking/accounting system that documents the EMA/TGA contribution to core medical services and supportive services • Review grantee budget for EMA/TGA contributions • Review actual tracking/accounting documentation of contributions 	<p>Submit the following MOE information to HRSA/HAB annually:</p> <ul style="list-style-type: none"> • A list of core medical and support services budget elements that will be used to document MOE in subsequent grant applications • A description of the tracking system that will be used to document these elements • Budget for EMA/TGA contributions • Tracking/accounting documentation of actual contributions 	N/A	<p>PHS ACT 2605 (a)(1)</p> <p>Funding Opportunity Announcement</p> <p>Part A Manual</p>
2. Use of Part A funds are used to supplement, not supplant, State funds made available in the year for which the grant is awarded to provide HIV related services to individuals with HIV disease	Review of Maintenance of Effort (MOE) list and worksheet submitted with application stating the core medical services offered by the State to verify that Part A funds have not been used to fund these services during the grant year	Prepare and submit to HRSA/HAB required worksheet with sufficient detail to document the use of Part A funds to expand services and not to substitute funding for existing services	N/A	PHS ACT 2605(a)(1)

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
Section K: Fiscal Procedures				
1. Grantee and subgrantee policies and procedures in place for handling revenues from the Ryan White grant, including program income	<ul style="list-style-type: none"> • Review policies and procedures related to the handling of cash or Ryan White grantee or subgrantee revenue • Sample accounting entries to verify that cash and grant revenue is being recorded appropriately 	<ul style="list-style-type: none"> • Establish policies and procedures for handling Ryan White revenue • Prepare a detailed chart of accounts and general ledger that provide for the tracking of Part A revenue • Monitor policies and handling of Ryan White revenues by subgrantees 	<ul style="list-style-type: none"> • Establish policies and procedures for handling Ryan White revenue including program income • Prepare a detailed chart of accounts and general ledger that provide for the tracking of Part A revenue • Make the policies and process available for grantee review upon request 	
2. Advances of federal funds not to exceed 30 days and to be limited to the actual, immediate cash requirements of the program Note: Grantee permitted to draw down 1/12 of funds, but at the end of each month must do a reconciliation to actual expenses	<ul style="list-style-type: none"> • Review grantee's advance policy to assure it does not allow advances of federal funds for more than 30 days • Review subgrantee agreements for allowable advances • Review payments to subgrantees and payment management system draw-downs 	<ul style="list-style-type: none"> • Provide expense documentation with every payment management system draw-down or reconciled PMS request to expenses on a monthly basis • Establish subgrant arrangements that limit advances of federal funding to 30 days • Document reconciliation of federal advances to subgrantees to submitted 	Document reconciliation of advances to actual expenses	45 CFR 74.22 45 CFR 92.21

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
3. Right of the awarding agency to inspect and review records and documents that detail the programmatic and financial activities of grantees and subgrantees in the use of Ryan White funds	Review subgrantee agreements to ensure that language is included that guarantees access to records and documents as required to oversee the performance of the Ryan White subgrantee	<p>expenses</p> <ul style="list-style-type: none"> • Include a provision in subgrantee agreements that guarantees grantee access to subgrantee records and documents for program and fiscal monitoring and oversight • Have in place policies and procedures that ensure HRSA/HAB similar access to grantee records and documents 	Have in place policies and procedures that allow the grantee as funding agency prompt and full access to financial, program, and management records and documents as needed for program and fiscal monitoring and oversight	45 CFR 74.61 45 CFR 92.41
4. Awarding agency to have access to payroll records, tax records, and invoices with supporting documentation to show that expenses were actually paid appropriately with Ryan White funds	<p>Use of primary source documentation for review:</p> <ul style="list-style-type: none"> • A sample of grantee and subgrantee payroll records • Grantee and subgrantee documentation that verifies that payroll taxes have been paid • Grantee and subgrantee accounts payable process, including a sampling of actual paid invoices with back-up documentation 	<ul style="list-style-type: none"> • Maintain file documentation of payroll records and accounts payable, and hard-copy expenditures data • Include in subgrant agreements conditions that require the subgrantee to maintain and provide access to primary source documentation 	<ul style="list-style-type: none"> • Maintain file documentation of payroll records and accounts payable, and hard-copy expenditures data • Make such documentation available to the grantee on request 	45 CFR 74.61 45 CFR 92.4
5. Awarding agency not to withhold payments for proper charges incurred by grantee unless the grantee or subgrantee has failed to comply with grant award	Review the timing of payments to subgrantee through sampling that tracks accounts payable process from date invoices are received to date checks are deposited	Periodically track the accounts payable process from date of receipt of invoices to date the checks are deposited	<ul style="list-style-type: none"> • Provide timely, properly documented invoices • Comply with contract conditions 	45 CFR 74.22 45 CFR 92.21 2 CFR 215.22

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>conditions or is indebted to the United States; grantee not to withhold subgrantee payments unless subgrantee has failed to comply with grant award conditions</p>				
<p>6. Awarding agency to make payment within 30 days after receipt of a billing, unless the billing is improperly presented or lacks documentation</p>	<ul style="list-style-type: none"> • Review grantee payable records • Review subgrantee invoices, submission dates, and bank deposits of Part A payments • Review grantee policies on how to avoid payment delays of more than 30 days to subgrantees 	<ul style="list-style-type: none"> • Establish and implement policies and procedures that allow for partial payments of invoices • Review reimbursement to subgrantees to determine whether it routinely occurs within 30 days of receipt of Invoice, and document delays due to incomplete documentation • Take action to improve reimbursement rates if review shows payment period of more than 30 days 	<ul style="list-style-type: none"> • Submit invoices on time monthly, with complete documentation • Maintain data documenting reimbursement period, including monthly bank reconciliation reports and receivables aging report 	<p>45 CFR 74.22 45 CFR 92.21 2 CFR 215.22 (e)(4) Part C</p>
<p>7. Employee time and effort to be documented, with charges for the salaries and wages of hourly employees to:</p> <ul style="list-style-type: none"> • Be supported by documented payrolls approved by the 	<p>Review documentation of employee time and effort, through:</p> <ul style="list-style-type: none"> • Review of payroll records for specified employees • Documentation of allocation of payroll between funding sources if applicable 	<ul style="list-style-type: none"> • Maintain payroll records for specified employees • Establish and consistently use allocation methodology for employee expenditures where employees are engaged in activities supported by several funding sources 	<ul style="list-style-type: none"> • Maintain payroll records for specified employees • Establish and consistently use allocation methodology for employee expenditures where employees are engaged in activities supported 	<p>29 CFR Part 516</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>responsible official</p> <ul style="list-style-type: none"> • Reflect the distribution of activity of each employee • Be supported by records indicating the total number of hours worked each day 			<p>by several funding sources</p> <ul style="list-style-type: none"> • Make payroll records and allocation methodology available to grantee upon request 	
<p>8. Applicants for Ryan White Part A funds will present a staffing plan and provide a justification for the plan that includes education and experience qualifications and rationale for the amount of time being requested for each staff position</p>	<ul style="list-style-type: none"> • Review grantee Staffing Plan • Review Personnel section of grantee budget and related budget justification, including staff positions, education and experience qualifications, and rationale for the amount of time requested for each staff person 	<p>As part of application, provide:</p> <ul style="list-style-type: none"> • Staffing Plan • Budget and budget justification, including staff positions, education and experience qualifications, and rationale for the amount of time requested for each staff person 	<p>N/A</p>	<p>Funding Opportunity Announcement</p>
<p>9. Grantee and subgrantee fiscal staff are responsible for:</p> <ul style="list-style-type: none"> • Ensuring adequate reporting, reconciliation, and tracking of program expenditures • Coordinating fiscal activities with program activities (<i>For example, the program and fiscal staff's meeting schedule and how fiscal</i> 	<ul style="list-style-type: none"> • Review qualifications of program and fiscal staff • Review program and fiscal staff plan and full-time equivalents (FTEs) to determine if there are sufficient personnel to perform the duties required of the Ryan White grantee • Review grantee organizational chart 	<ul style="list-style-type: none"> • Review the following: <ul style="list-style-type: none"> ○ Program and fiscal staff resumes and job descriptions ○ Staffing Plan and grantee budget and budget justification ○ Grantee organizational chart • Require and review similar information for subgrant applicants 	<ul style="list-style-type: none"> • Review the following: <ul style="list-style-type: none"> ○ Program and fiscal staff resumes and job descriptions ○ Staffing Plan and grantee budget and budget justification ○ Subgrantee organizational chart • Provide information to the grantee upon request 	<p>Funding Opportunity Announcement</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p><i>staff share information with program staff regarding contractor expenditures, formula and supplemental unobligated balances, and program income)</i></p> <ul style="list-style-type: none"> • Having an organizational and communications chart for the fiscal department 				
<p>10. EMA/TGA must submit an estimation of carryover funds 60 days prior to the end of the grant period – by December 31 of every calendar year</p>	<ul style="list-style-type: none"> • Review carryover request • Review grantee accounting reports that document unobligated funds included in carryover request 	<ul style="list-style-type: none"> • Prepare accounting reports that document unobligated balances included in carryover request • Prepare and submit estimated unobligated balances and estimated carryover request 60 days prior to end of grant year. <p>NOTE: No requests will be approved without this submission</p>		<p>HAB Policy Notice 10-01</p>
<p>Section L: Unobligated Balances</p>				
<p>1. EMA/TGA demonstration of its ability to expend fund efficiently by expending</p>	<ul style="list-style-type: none"> • Review grantee and subgrantee budgets • Review grantee accounting and financial reports that 	<ul style="list-style-type: none"> • Prepare and submit estimated unobligated balance and estimated carryover request. No 	<ul style="list-style-type: none"> • Report monthly expenditures to date to the grantee Inform the grantee of 	<p>PHS ACT 2603(c) HAB Policy Notice 10-01</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>95% of its formula funds in any grant year Note: EMA/TGA must submit an estimation of unobligated balance 60 days prior to the end of the grant period – by December 31 of every calendar year.</p>	<p>document the year-to-date and year-end spending of grantee and subgrantee obligated funds, including separate accounting for formula and supplemental funds</p> <ul style="list-style-type: none"> • Calculation of unspent funds and potential unspent funds to determine estimated unobligated balance 	<p>carryover requests will be approved without submission.</p> <ul style="list-style-type: none"> • Review submission of both grantee and subgrantee budgets • Maintain accounting and financial reports that document year-to-date spending of grantee and subgrantee funds • Review individual subgrantee financial reports that document unspent funds • Calculate year-to-date expenditures and budget variances monthly • Develop a reallocation methodology and implement it in coordination with the Planning Council 	<p>variances in expenditures.</p>	<p>HAB Policy Notice 12-02</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<p>2. EMA/TGA annual unobligated balance for formula dollars of no more than 5% reported to HRSA/HAB in grantee's Federal Financial Report (FFR)</p>	<p>Determination of the breakdown of the unobligated balance in the FFR by Formula, Supplemental, and Carryover</p> <ul style="list-style-type: none"> • Submission of the final annual FFR no later than the July 30 after the closing of the grant year, without exception 	<ul style="list-style-type: none"> • Track grant fund expenses by: Formula, Supplemental and Carryover • Proactively track subgrantees' unspent funds • Establish a process to assure that the Finance Department of the political subdivision receiving the funds (municipality, county, etc.) is aware of the importance of timely submission of an FFR and of spending formula dollars first • Proactively track the FFR submission and assure its reconciliation with EMA Formula, Supplemental, and carryover expenditures 	<ul style="list-style-type: none"> • Provide timely reporting of unspent funds, position vacancies, etc. to the grantee • Establish and implement a process for tracking unspent Part A funds and providing accurate and timely reporting to the grantee • Be an active participant in the re-allocation process by informing the grantee on a timely basis of funds not spent or funds spent too quickly 	<p>PHS ACT 2603(b)(1)(H)</p> <p>HAB Policy Notice 10-01</p>
<p>3. EMA/TGA recognition of consequences of unobligated balances and evidence of plans to avoid a reduction of services, if any of the following penalties is applied:</p> <p>a. Future year award is offset by the amount of the unobligated balance less any approved carry over</p>	<ul style="list-style-type: none"> • Review EMA/TGA compliance with any cancellation of unobligated funds • Review EMA/TGA grantee and subgrantee budgets and implementation of plans on how not to reduce services in a penalty year 	<ul style="list-style-type: none"> • Implement a cost-saving plan to address penalties resulting from excessive unobligated balance • Explore the possibility of requesting or using local dollars to offset any penalty to the program 	<ul style="list-style-type: none"> • Report any unspent funds to the grantee • Carry out monthly monitoring of expenses to detect and implement cost- saving strategies 	<p>PHS ACT 2603 (c)</p> <p>HAB Policy Notice 10-01</p>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
b. Future year award is reduced by amount of unobligated balance less the amount of approved carry over c. The grantee is not eligible for a future year supplemental award				

Tarrant County HIV Administrative Agency
Fiscal Policies and Procedures

ATTACHMENT C: RESOURCES

Policy Notices and Program Letters

The Ryan White HIV/AIDS Program legislation was first enacted in 1990 as the Ryan White Comprehensive AIDS Resources Emergency (CARE) Act. It has been amended and reauthorized four times: in 1996, 2000, 2006, and 2009. The legislation, the Ryan White HIV/AIDS Treatment Extension Act of 2009 (Public Law 111-87, October 30, 2009), delineates the statutory requirements of the program.

[View the Ryan White HIV/AIDS Program legislation](#) (PDF - 1.3 MB).

HRSA develops policies that implement the legislation, providing guidance to recipients in understanding and implementing legislative requirements. These policies are available by clicking on the following link <https://hab.hrsa.gov/program-grants-management/policy-notice-and-program-letters>

Program Income Presentation

<https://www.targethiv.org/sites/default/files/supportingfiles/Parts%20C%20and%20D%20QA%20on%20Program%20Income%20June%202016.pdf>

Uniform Grant Guidance

Final Guidance has been issued by the Office of Management and Budget that supersedes requirements from OMB Circulars A-21, A-87, A-110, and A-122; Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up. PART 75—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR HHS AWARDS establishes uniform administrative requirements, cost principles, and audit requirements for Federal awards to non-Federal entities. See link to final guidance below:

<https://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html>

The effective date of **45 CFR 75** Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards is December 26, 2014, and the requirements are applicable to grants issued on or after that date. For non-Federal entities that are nonprofit organizations or institutions of higher education, there is a one-year grace period for implementation of the procurement standards in 45 CFR 75.316 through 75.325.