

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

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“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.

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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

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	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

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	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

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<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>²2 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

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<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

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	<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>

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<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>

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<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>

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<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>

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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

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program income by grantee and subgrantees	reporting of program income, <ul style="list-style-type: none"> • Review of program income reported by the grantee in the FFR and annual reports 	and tracking of program income, Require subgrantee reporting of program income	and obtained	2 CFR 215.24
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: <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 	45 CFR 74.24 and 92.25 2 CFR 215.24 Funding Opportunity Announcement

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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)

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		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)

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			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>

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<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

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<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)

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
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> <ol style="list-style-type: none"> Follow state law and procedures when awarding and administering subgrants (whether on a cost reimbursement or fixed amount basis) Ensure that every subgrant includes any clauses required by federal statute and executive orders and their implementing regulations Ensure that subgrant 	<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>

Standard	Performance Measure/ Method	Grantee Responsibility	Provider/Subgrantee Responsibility	Source Citation
<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)

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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

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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

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conditions or is indebted to the United States; grantee not to withhold subgrantee payments unless subgrantee has failed to comply with grant award conditions				
6. Awarding agency to make payment within 30 days after receipt of a billing, unless the billing is improperly presented or lacks documentation	<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 	45 CFR 74.22 45 CFR 92.21 2 CFR 215.22 (e)(4) Part C
7. Employee time and effort to be documented, with charges for the salaries and wages of hourly employees to: <ul style="list-style-type: none"> • Be supported by documented payrolls approved by the 	Review documentation of employee time and effort, through: <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 	29 CFR Part 516

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<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>

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<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>

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<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>

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<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>

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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				