



# Health Resources and Services Administration

## Ryan White HIV/AIDS Program Part B

### Administrative Reverse Site Visit



# **HIV/AIDS Bureau Policy Clarification Notices Overview**

## **Division of State HIV/AIDS Programs Ryan White HIV/AIDS Program Part B Administrative Reverse Site Visit**

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Department of Health and Human Services  
Health Resources and Services Administration  
HIV/AIDS Bureau



# Ryan White HIV/AIDS Program

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- Provides comprehensive system of HIV primary medical care, medications, and essential support services for low-income people living with HIV
  - More than half of people living with diagnosed HIV in the United States – more than 500,000 people – receive care through the Ryan White HIV/AIDS Program
- Funds grants to states, cities/counties, and local community based organizations
  - Recipients determine service delivery and funding priorities based on local needs and planning process
- Payor of last resort statutory provision: RWHAP funds may not be used for services if another state or federal payer is available

Source: HRSA. Ryan White HIV/AIDS Program Annual Client-Level



# Ryan White HIV/AIDS Program

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- Parts A (Cities), B (States), C (Community based organizations), and D (Community based organizations for women, infants, children, and youth) Services include:
  - Medical care, medications, and laboratory services
  - Clinical quality management and improvement
  - Support services including case management, medical transportation, and other services
- Part F Services
  - Clinician training, dental services, and dental provider training
  - Development of innovative models of care to improve health outcomes and reduce HIV transmission among hard to reach populations
- 83% of Ryan White HIV/AIDS Program clients were virally suppressed in 2015, exceeding national average of 55%



# HAB Budget History

## FY 2016 Total Budget: \$2.3 billion

HIV/AIDS Bureau Programs	FY 2016 Enacted
Emergency Relief Grants – Part A	656
HIV Care Grants to States – Part B	1,315
Early Intervention Services – Part C	205
Women, Infants, Children, and Youth – Part D	75
Part F Programs	72

*Note: All dollars in millions. For the FY 2017 funding level, HRSA is under a continuing resolution through April 28, 2017 pursuant to the Further Continuing and Security Assistance Appropriations Act (P.L. 114-254)*



# Payor of Last Resort Requirements Within the Context of Public and Private Coverage

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- By statute, RWHAP funds may not be used “for any item or service to the extent that payment has been made, or can reasonably be expected to be made...” by another payment source
- Recipients must vigorously pursue enrollment in other relevant funding sources as a means to ensure RWHAP remains the payor of last resort
- RWHAP recipients must assess individual clients that are not eligible for public programs. The RWHAP will continue to pay for items or services received by individuals who remain uninsured or for services not covered by health care plans



# Major Areas of Focus: PCNs 2013-2016

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- Guidance related to the shifting healthcare landscape
- Ensuring RWHAP remains the payor of last resort with increasing alternative payers
- Guidance on Core Medical Services Waiver applications – making the most of limited resources
- Program and operational guidance to RWHAP recipients, including grants management and fiscal management
- Clarifications regarding implementation of the clinical quality management requirement
- Clarification of allowable uses of RWHAP funds



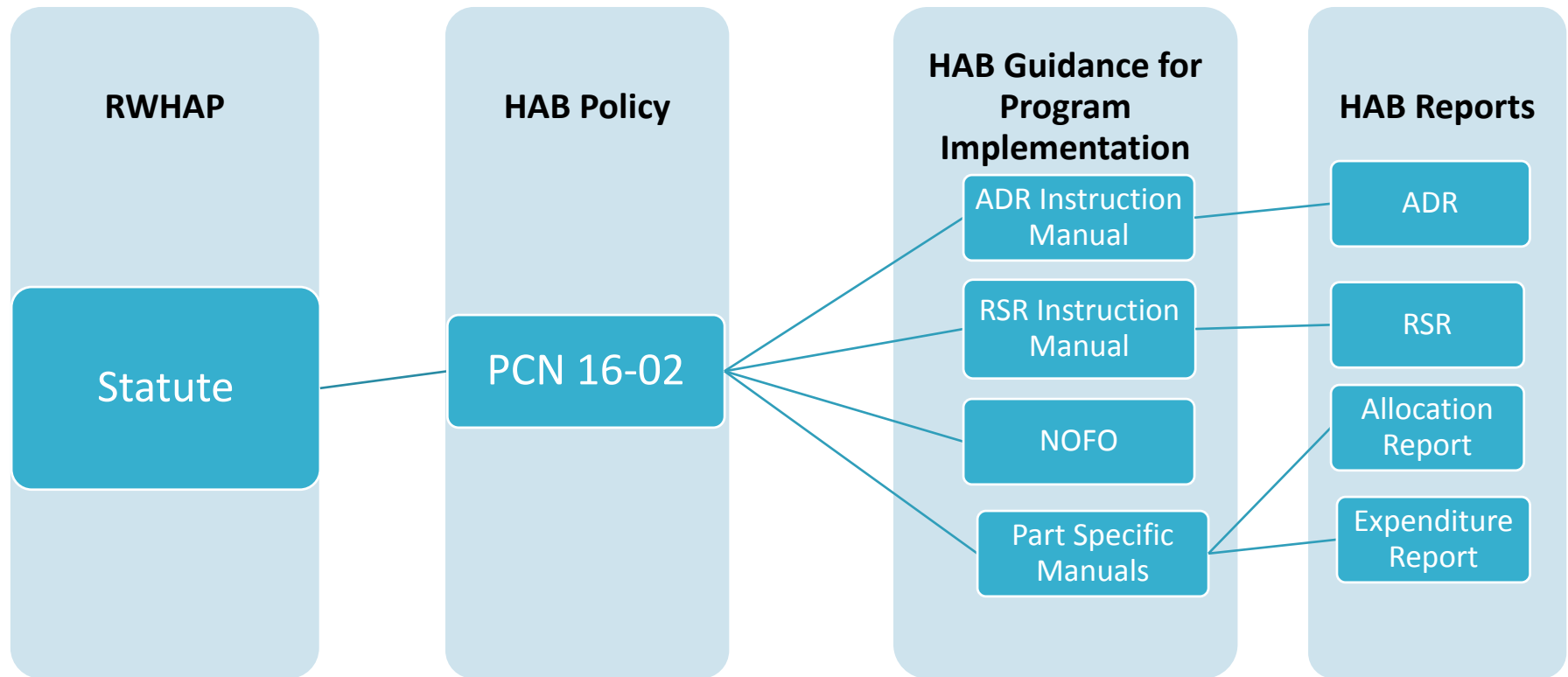
# Policies Released by HAB in 2015-2016

- **#15-01** Treatment of Costs under the 10% Administrative Cap for RWHAP Parts A, B, C, and D
- **#15-02** Clinical Quality Management Policy Clarification Notice
- **#15-03** Clarifications Regarding the Ryan White HIV/AIDS Program and Program Income
- **#15-04** Utilization and Reporting of Pharmaceutical Rebates
- **#16-01** Clarifications of the Ryan White HIV/AIDS Program (RWHAP) Policy on Services Provided to Veterans
- **#16-02** Ryan White HIV/AIDS Program Services: Eligible Individuals and Allowable Uses of Funds





# Role of Policy Clarification Notices in Program Implementation



# Purpose of PCN #16-02 RWHAP Services: Eligible Individuals & Allowable Uses of Funds

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- Ensures consistency of program service categories with RWHAP legislation
- Clarifies service categories and program guidance related to services provided through the RWHAP
- Aligns service categories across HIV/AIDS Bureau documents, products, and activities
- Effective with Fiscal Year 2017 funding



# Service Categories vs. Activities

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- **Recipients may use different terms for their grant activities, which may not match the service category names**
  - A recipient might provide what they call linkage to care coordination which meets the definition and activities of Medical Case Management
  - A recipient might have staff who are “Rural Outreach Coordinators” whose work is aligned with Early Intervention Services
- **Whatever the recipient calls the grant activity, it must fit within a service category as described in PCN #16-02**
- **This enables appropriate reporting of services delivered**



# Documents and Program Guidance Related to PCN #16-02

- PCN #16-02 is applicable to all RWHAP awards (including noncompeting continuations and supplements) made on or after October 1, 2016
- PCN #16-02 replaces PCN #10-02
- Impact on HAB Data Reporting and Programmatic Requirements

Data Reporting	Programmatic Requirements
RWHAP Services Report	National Monitoring Standards
ADAP Data Report	Notice of Funding Opportunity Announcements
Grantee Contract Management System	Part Manuals
Allocation Reports	Program Terms in Notice of Awards
Expenditure Reports	Site Visit Modules

# PCN #16-02 RWHAP Services: Eligible Individuals & Allowable Uses of Funds - Changes

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- **Service descriptions and names**
  - Consistency with RWHAP statute
  - Non-medical Case Management
- **Consolidation of some services**
  - Pediatric Developmental Assessment
  - Treatment Adherence Services
  - Other Professional Services
- **Greater detail provided for some**
  - AIDS Pharmaceutical Assistance
  - Early Intervention Services



# PCN #16-02 Service Categories Overview

CORE MEDICAL	SUPPORT
<ul style="list-style-type: none"><li>• Outpatient/Ambulatory Health Services</li><li>• AIDS Drug Assistance Program Treatments</li><li>• AIDS Pharmaceutical Assistance</li><li>• Oral Health Care</li><li>• Early Intervention Services (EIS)</li><li>• Health Insurance Premium and Cost Sharing Assistance for Low-Income Individuals</li><li>• Home Health Care</li><li>• Home and Community-Based Health Services</li><li>• Hospice Services</li><li>• Mental Health Services</li><li>• Medical Nutrition Therapy</li><li>• Medical Case Management, including Treatment Adherence Services</li><li>• Substance Abuse Outpatient Care</li></ul>	<ul style="list-style-type: none"><li>• Non-Medical Case Management Services</li><li>• Child Care Services</li><li>• Emergency Financial Assistance</li><li>• Food Bank/Home Delivered Meals</li><li>• Health Education/Risk Reduction</li><li>• Housing</li><li>• Other Professional Services</li><li>• Linguistic Services</li><li>• Medical Transportation</li><li>• Outreach Services</li><li>• Psychosocial Support Services</li><li>• Referral for Health Care and Support Services</li><li>• Rehabilitation Services</li><li>• Respite Care</li><li>• Substance Abuse Services (residential)</li></ul>



# PCN #16-02 Updates

- **Health Insurance Premiums and Cost Sharing Assistance Service Category** applies to standalone dental insurance
- **ADAP Treatments** clarification
- **Substance Abuse Services (residential)** allowable for Parts C/D
- **Medical Transportation**  
Clarification of how RWHAP funds can be used for provider transportation
- **Housing** allowable cost for Part C



DEPARTMENT OF HEALTH & HUMAN SERVICES

HIV/AIDS Bureau

Health Resources and Services  
Administration

Rockville, MD 20857

DEC 05 2016

Dear Ryan White HIV/AIDS Program Colleagues:

This letter addresses the use of Ryan White HIV/AIDS Program (RWI) standalone dental insurance premiums and/or cost sharing assistance under Parts B, C, and D of Title XXVI of the Public Health Service Act, as amended by the HIV/AIDS Treatment Extension Act of 2009.

The HIV/AIDS Bureau (HAB) recognizes the essential role of oral health in achieving positive health outcomes for people living with HIV and the role of dental insurance in ensuring access to these services. HAB has updated *Policy Clarification Notice 02 Ryan White HIV/AIDS Program Services: Eligible Individuals and Allowable Uses of Funds* to include the use of RWHAP resources to support standalone dental insurance premiums and/or cost sharing assistance under the Health Insurance Program (HIP) Sharing Assistance for Low-Income Individuals service category. The provision consists of the following:

- Paying health insurance premiums to provide comprehensive dental services; and/or
- Paying standalone dental insurance premiums to provide comprehensive dental services; and/or
- Paying cost sharing on behalf of the client.

Updated PCN #16-02 also removes the prohibition on RWHAP Parts C and D funds for Substance Abuse Services (residential); clarifies that these funds can be used for provider transportation in the Program Guidance for RWHAP Parts A, C, and D. PCN #16-02 is applicable to all RWI funding categories in alphabetical order. PCN #16-02 is applicable to all RWI funding categories in alphabetical order. PCN #16-02 is applicable to all RWI funding categories in alphabetical order.

Please contact your HAB Project Officer for questions about using standalone dental insurance premiums and cost sharing assistance.

Sincerely,

/Laura W. Cheever/  
Laura W. Cheever, MD, MPH  
Associate Administrator  
HIV/AIDS Bureau  
Health Resources and Services Administration

## **Ryan White HIV/AIDS Program Services: Eligible Individuals & Allowable Uses of Funds**

*Policy Clarification Notice (PCN) #16-02 (Revised 12/05/16)  
Replaces Policy #10-02*

**Scope of Coverage:** Ryan White HIV/AIDS Program (RWHAP) Parts A, B, C, and D, and Part F where funding supports direct care and treatment services.

### **Purpose of PCN**

This policy clarification notice replaces the Health Resources and Services Administration (HRSA) PCN 10-02: *Eligible Individuals & Allowable Uses of Funds for Discretely Defined Categories of Services* regarding eligible individuals and the description of allowable service categories for Ryan White HIV/AIDS Program and program guidance for implementation.

### **Background**

The Office of Management and Budget (OMB) has consolidated, in 2 CFR Part 200, the uniform grants administrative requirements, cost principles, and audit requirements for all organization types (state and local governments, non-profit and educational institutions, and hospitals) receiving federal awards. These requirements, known as the "Uniform Guidance," are applicable to recipients and subrecipients of federal funds. The OMB Uniform Guidance has been codified by the Department of Health and Human Services (HHS) in [45 CFR Part 75—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Programs](#). RWHAP grant and cooperative agreement recipients and subrecipients should be thoroughly familiar with 45 CFR Part 75. Recipients are required to monitor the activities of the subrecipient to ensure the subaward is used for authorized purposes in compliance with applicable statute, regulations, policies and the terms and conditions of the award (see [45 CFR §§ 75.351-352](#)).

[45 CFR Part 75, Subpart E—Cost Principles](#) must be used in determining allowable costs that may be charged to a RWHAP award. Costs must be necessary and reasonable to carry out approved project activities, allocable to the funded project, and allowable under the Cost Principles, or otherwise authorized by the RWHAP statute. The treatment of costs must be consistent with recipient or subrecipient policies and procedures that apply uniformly to both federally-financed and other non-federally funded activities.

The HIV/AIDS Bureau (HAB) has developed program policies that incorporate both HHS regulations and program specific requirements set forth in the RWHAP statute. Recipients, planning bodies, and others are advised that independent auditors, auditors from the HHS' Office of the Inspector General, and auditors from the U.S.

**HIV/AIDS BUREAU POLICY 16-02**



# How to Use the Policy Clarification Notices

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- Go to the PCN and READ it
- Read the policy again
- Have a colleague read it and talk through what it means for your program
- Talk to you project officer
- Talk with your internal resources (e.g., legal advice)





# Where to find Policy Clarification Notices

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All Program Clarification Notices and Letters  
can be found at:

<http://hab.hrsa.gov/manageyourgrant/policies/letters.html>



# Thank You!

**Antigone Dempsey**

**HIV/AIDS Bureau**

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