

# We Survived A HRSA Site Visit...And So Can You!

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#### Objectives



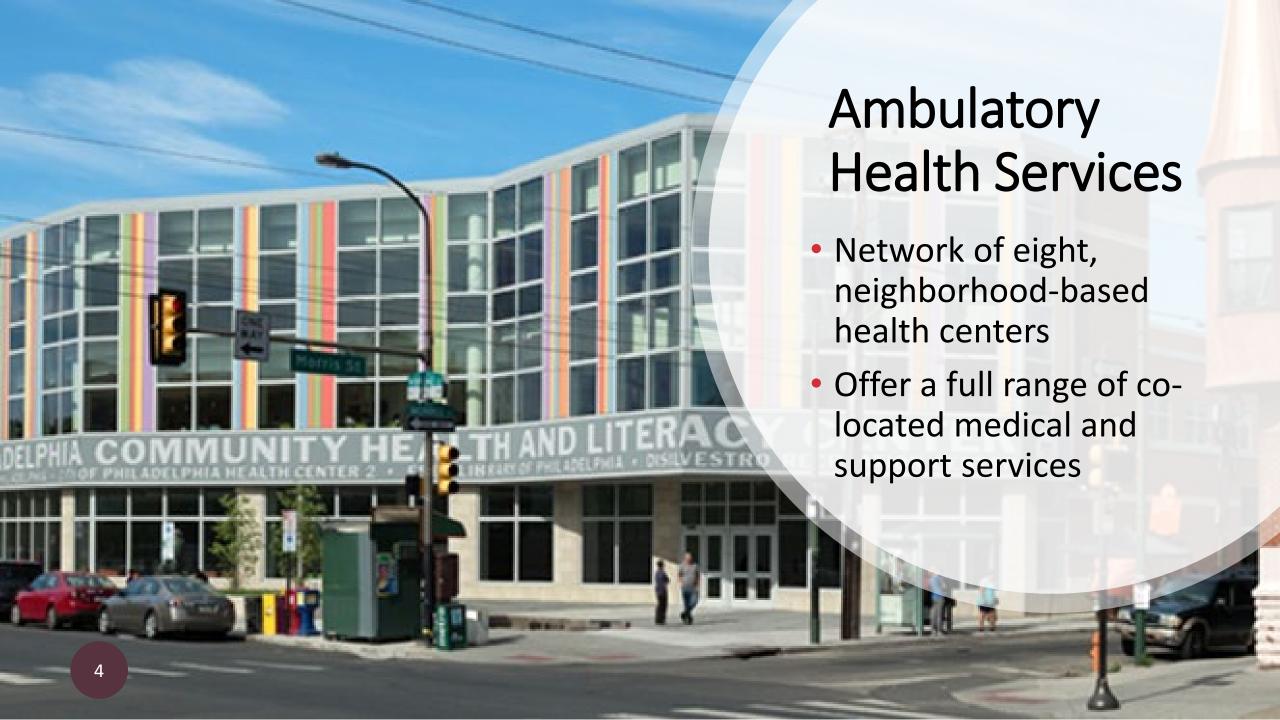
 Review the key administrative, clinical, and fiscal requirements for a HRSA Site Visit

 Identify best practices to prepare for, host and follow up to a HRSA site visit



# Agency Background

Philadelphia Department of Public Health, Ambulatory Health Services HIV Program



### **Ambulatory Health Services 2**







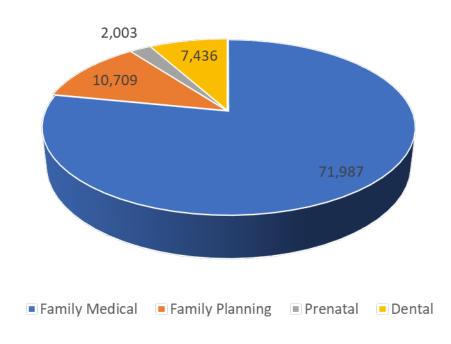
 Services offered to all Philadelphia residents regardless of insurance status

### **Ambulatory Health Services 3**



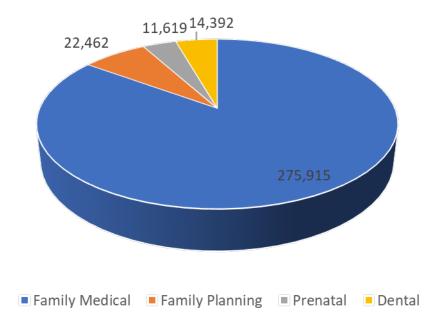
#### FY20 Total Patients - 78,321

Total Patients by Discipline



#### **FY20 Total Visits – 324,388**

Total Visits by Discipline

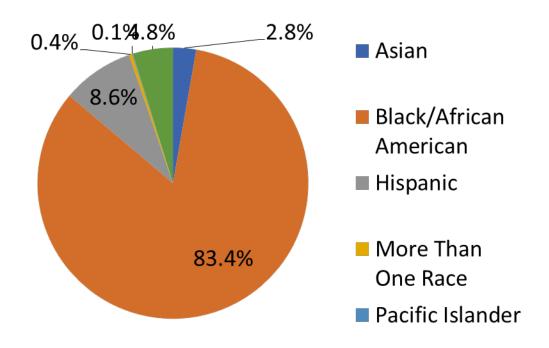


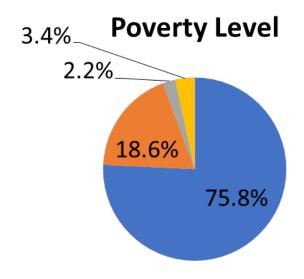
#### AHS HIV Program



• 1,034 patients were seen in FY20



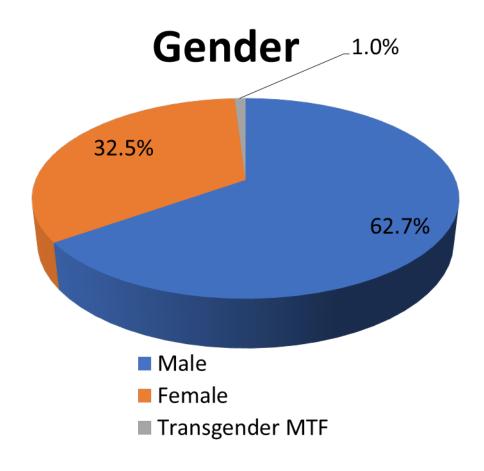


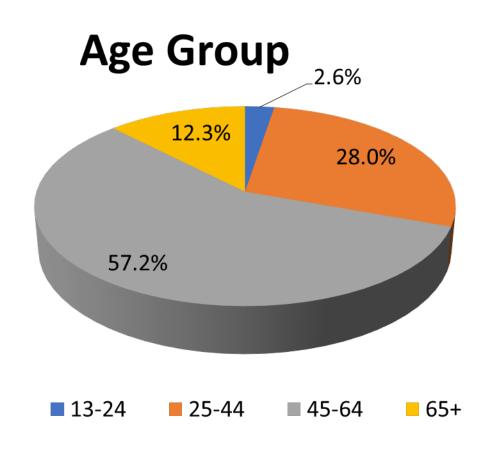


- Under 100% FPL
- Between 100% and 200% of the FPL
- Up to 250% of the FPL
- Above 250% of FPL

## Patient Demographics







# HIV Program Staffing

- Program Director
- Program Administrator
- Clinical Care Coordinator
- Quality Assurance Specialist
- 10 Clinicians
- 8 Nurses
- 6 Social Workers
- 5 Medical Case Managers
- 2 Health System Navigators
- 2 Patient Representatives
- Women's Health Coordinator
- PrEP Navigators
- Community Clinical Coordinator
- LGBTQ Care Coordinator





# Ryan White Part C and D Programs



#### **Ryan White Part C**

- Roughly 350 patients seen at Health Centers 3, 4, and 5
- Funds clinical time, psychosocial support, medical case management, social work, LGBTQ care coordination, clinical quality management, administrative support
- Sub-recipients:
  - Temple University Kornberg School of Dentistry
  - Children's Hospital of Philadelphia
  - Hospital of the University of Pennsylvania, Infectious Diseases

#### **Ryan White Part D**

- Roughly 117 Women, Infants, Children, and Youth seen at Health Center 10 and Strawberry Mansion Health Center
- Funds psychosocial support, medical case management, health system navigation
- Sub-recipients:
  - Temple University Kornberg School of Dentistry



# Comprehensive HRSA Site Visit

What is it?

#### Comprehensive HRSA Site Visit 2



- Key component of HRSA/HAB grantee oversight
- Reviews RWHAP recipients to ensure the provision of comprehensive, high quality healthcare for PLWH and compliance with legislative, regulatory, and programmatic requirements
- Consists of three review components: Clinical, Fiscal, and Administrative by three reviewers and the project officer
- In event of program deficiencies, a corrective action plan will be created to bring the program into compliance
- Occurs every 3-5 years
- Length of visit depends on amount of awards received



# HRSA Site Visit

Early and Intermediate Preparation

## **Early Preparation**



Notification from project officer

Identification of potential visit dates

Assess readiness

### **Assessing Readiness - Tools**



HRSA Site Visit Assessment Tool Materials to be Made Available for the Site Visit Team Clinical
Quality
Management
Plan Review
Checklist

#### Site Visit Assessment Tool



- Divided into three modules: clinical, fiscal, and administrative
- Each module features four requirements with questions or elements to be assessed by the reviewer
- Source documents for requirements
   review and file for quick reference
- Determining compliance:
  - Met
  - Not Met
  - Not Applicable

#### Section 1. Fiscal Module

Requirement 1: Ryan White HIV/AIDS Program Budget and Use of Grant Funds
Materials to Review/Source Documents:

- Legal: RWHAP Part C legislation, sections 2651 through 2667 of the Public Health Service (PHS) Act (42 U.S.C. 300ff-51-300ff-67);
   RWHAP Part D legislation, section 2671 of the PHS Act (42 U.S.C. 300ff-71); Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards (UAR) 45 CFR part 75
- Programmatic: HAB Policy Clarification Notices (PCN) 11-04, 13-07, 15-01, 15-02, 15-03 and 16-02; June 22, 2016 RWHAP and PrEP program letter; Ryan White HIV/AIDS Program Part C Early Intervention Services (EIS) Notice of Funding Opportunity (NOFO), Part D Women, Infant Children and Youth (WICY) NOFO and most recent Notice of Award (NoA)

	Question	Revie	ew Criteria	Reference(s)/Citation(s) for	Str	rengths and Best Practices
				Specific Questions		
	l	Programmatic Resource:  HAB PCN 16-02    Services: After reserving funds for recosts (including planning/evaluation, as B PCN 15-01) and clinical quality   Costs (as defined in HAB PCN 15-02), does   Programmatic Resources:    Section 2651(b)(2)  Programmatic Resource:  HAB PCN 16-02    Met   Legal:  Not Met   Section 2651(c)(1)  Programmatic Resources:				
	Early Intervention Services (EIS): Does the recipient spend	□Met	t /	Legal:		
١	at least 50 percent of the total funds awarded on Early	□Not	M∉t	<ul> <li>Section 2651(b)(2)</li> </ul>	\	
١	Intervention Services (EIS)? (Legal)				\	
- 1			/		\	
Į				• HAB PCN 16-02		
١	Core Medical Services: After reserving funds for	□Me	t	Legal:		\
١	Administrative costs (including planning/evaluation, as	□Not	Met	<ul> <li>Section 2651(c)(1)</li> </ul>		
١	defined in HAB PCN 15-01) and clinical quality					
١	management costs (as defined in HAB PCN 15-02), does					
١	the recipient allocate at least 75 percent of the remaining			<ul> <li>HAB PCN 16-02</li> </ul>		
١	funds on Core Medical Services (which includes EIS)?			<ul> <li>HAB PCN 15-02</li> </ul>		
١	(Legal)	l \		<ul> <li>HAB PCN 15-01</li> </ul>		1
	If Core Medical Services requirement "Not Met," did the	□ме	i	Legal:		
١	entity request and receive approval for a waiver?	□Not	Met	<ul> <li>Section 2651(c)(2)</li> </ul>	/	
١	(Legal)	□Not	Applicable		/	
١			\	Programmatic Resources:	/	
١			\	<ul> <li>HAB PCN 16-02</li> </ul>	/	
١				<ul> <li>HAB PCN 13-07</li> </ul>	/	
Į			$\overline{}$	•		



#### Material Checklist



#### Materials to be Made Available for the Site Visit Team Ryan White Parts C, D, and/or F Site Visit

In preparation for your upcoming site visit, please have the following materials available for the site visit review team in electronic or paper form. Materials from the past three years to the present will be reviewed. If you have any questions please discuss with your project officer.

Fiscal					
Fiscal policies and procedures	Accounting policies, procedures	llection policies and			
Ryan White HIV/AIDS Program Budget ((Part A, Part B, Part C, Part D, and Part F)	Budget for the organization (or for the organizational unit which includes the HIV/AIDS program)	ents			
Table of total funding for HIV/AIDS programs, including source of funds, funding period and amount	YTD report from the accounting system on expenditures of the Ryan White grants	ank statement(s) and (s)			
Policies, procedures, and records of drawdowns of Ryan White funds	reports presented to management payroll, includ	for the most recent ling evidence that thholding taxes			
Timesheets and time and effort documentations for employees paid with Ryan White funds for the most recent payroll	Contracts that are paid from Ryan White funds, contractor policies and procedures, most recent invoices and monitoring documents for contractors	istomary fees itpatient services by			

 Comprehensive list of fiscal, clinical, and administrative materials to be made available during the site visit either electronically or on paper

 Also requested: clinical records and CQI performance measures

#### **CQM Plan Review Checklist**



#### Clinical Quality Management Plan Review Checklist

Clarification Notice 15-02. Th		ent will meet the key components of a clinical quality management program as outlined in <u>Clini</u> ked questions for Clinical Quality Management Policy Clarification Notice 15-02. The frequently	
		nding of the grant recipient's clinical quality management program in a narrative format. A clin lated to the clinical quality management program (e.g. history of the grant recipient), which can	
		ment plan. Each section highlights the Health Resources and Services Administration Ryan Whit section are listed at the end of the document.	e HIV/AIDS Program expectations
Recipient:	Part:	Reviewer:	Division:
Date of Plan:		Date reviewed	

	Clinical Quality Management Plan Revi	ew Checklist					
Section	Content	Present: Yes/No/Partial	Comments				
General Inform	nation						
Include the name of the grant recipient and the date last updated or approved.							
<b>Quality Stater</b>	nent						
PCN 15-02	None						
Narrative	Brief, visionary, and related to HIV services						
Description							
Annual Qualit	Annual Quality Goals						
PCN 15-02	None						
Narrative	Outline year's priorities for the clinical quality management						
Description	program						
	Five or fewer measureable and realistic goals						
Quality Infrast	Quality Infrastructure						
PCN 15-02	<ul> <li>Utilization of Ryan White HIV/AIDS Program grant funds to establis</li> </ul>	h an appropriate inf	rastructure for a clinical quality				
	management program is allowed						
	An ideal infrastructure consists of: leadership, quality management co	mmittee, dedicated	staffing, dedicated resources, quality				
	management plan, consumer involvement, stakeholder involvement, a	nd evaluation of the	clinical quality management program				

- References Clinical Quality
   Management Policy Clarification
   Notice 15-02 as a guideline
- Addresses the key sections of the CQM Plan:
  - General Information
  - Quality Statement
  - Annual Quality Goals
  - Quality Infrastructure
  - Performance Management
  - Quality Improvement
  - Work Plan

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#### Master Document List



1	Materials Needed for 2020 HRSA Site Visit					
2						
3	Clinical					
4	HRSA Requirement	Have It?	Who Is Responsible?	Site Visit Location	Notes/Comments	
			Oumar Gaye		Instructions for sending the roster to be provided	
5	Roster of Active Patients		Mayla Jackson	HIV Clinical folder	by clinical reviewer on pre-visit conference call	
			  Mayla Jackson			
6	Clinical Protocols (see below listing for detail)		Dr. Kwakwa	HIV Clinical folder		
	SS-01 OraQuick ADVANCE HIV 1/2 Rapid					
7	Test (Oral Fluids)	X	Dr. Kwakwa	HIV Clinical folder		
					Will re-write; Oumar will call Cheree to see what	
8	Partner Services Protocol		Dr. Kwakwa	HIV Clinical folder	current protocol is	
			D 1/4 1		Will re-write if Dr. Dean or Gerry can't find original	
9	Universal Conventional HIV Testing Policy		Dr. Kwakwa	HIV Clinical folder	Will be write if Dr. Dean of Gerry can emilia original	
		\ <u>'</u>			Unsigned, dated December, 2013; may need	
10	Protocol for Patient Appointments	X	Dr. Kwakwa	HIV Clinical folder	update	
					Unsigned, dated December, 2013; may need	
4	Full checklist Policies and Procedures (+)					

### Site Visit Work Group





## Targeted Outreach



4	A
1	HRSA Ryan White Grants Site Visit
2	
	Below are a list of required items from HRSA for the upcoming site visit from 3/24/20-3/26/20.
	The site visit will cover Ryan White Part C and Part D grants only. When applicable, please provide data only for the health centers and HIV patients served by those grants:
	Ryan White Part C: All HIV patients at Health Centers 3, 4, and 5
	Ryan White Part D: Women, Infants, Children, and Youth (under age 25) HIV patients at Health Centers 10 and Strawberry Mansion Health Center
	A pre-site visit conference call will be held at some point in early February. Someone from fiscal is required to be on that call. An email will be sent as soon as potential dates are sent from the project officer.
3	
4	
5	Fiscal policies and procedures
6	Accounting policies, procedures and manuals
7	Annual FFR for last two years
8	Most recent A-133 audit
9	Total Operating Budget for current fiscal year
10	List of all Federal funding including Ryan White grants
11	Financial records, (documentation and receipts)
12	YTD report from the accounting system on expenditures of the Ryan White grants
13	Expenditure reports (monthly or quarterly)
14	Most recent bank statement(s) and reconciliation(s)
15	Policies, procedures and records of drawdowns of Ryan White funds
16	
17	Highlighted items are those that may be requested immediately following the pre-site visit conference call
18	
19	



Site Visit<br/>Specifics



Required Materials

### Intermediate Preparation



Concerns

Alert consultants

Provide TA

Notify subrecipient

Tentative details of visit

Review findings from previous monitoring visit



# HRSA Site Visit

Late stage planning

#### Pre-Site Visit Conference Call



- Likely to take place about a month prior to the site visit
- Mandatory attendees:
  - Project Officer
  - Site Visit Consultant Team (Administrative, Fiscal, and Clinical Consultants)
  - Branch Chief (invited, may attend)
  - Recipient Staff including
    - Executive Director/Project Director
    - HIV Program Coordinator
    - HIV Medical Director (Part C/D)
    - Chief Financial Officer or key fiscal staff member
    - Board member (if applicable)

#### Pre-Site Visit Conference Call



Introductions

Agenda

Logistics

### Site Visit Agenda



 Template provided by project officer for perspective; lead site visit consultant will provide final draft

#### Day 1

- Entrance
   Conference
- Tour of facility
- Meetings and/or document review
- Working or consumer lunch
- Meetings and/or document review

#### Day 2

- Subrecipient
   Facility Tour and
   Visit
- Meetings and/or document review
- Working or consumer lunch
- Meetings and/or document review

#### Day 3

- Meetings and/or document review
- Working lunch
- Pre-Exit
   Conference (if necessary)
- Exit Conference

#### **Final Preparations**

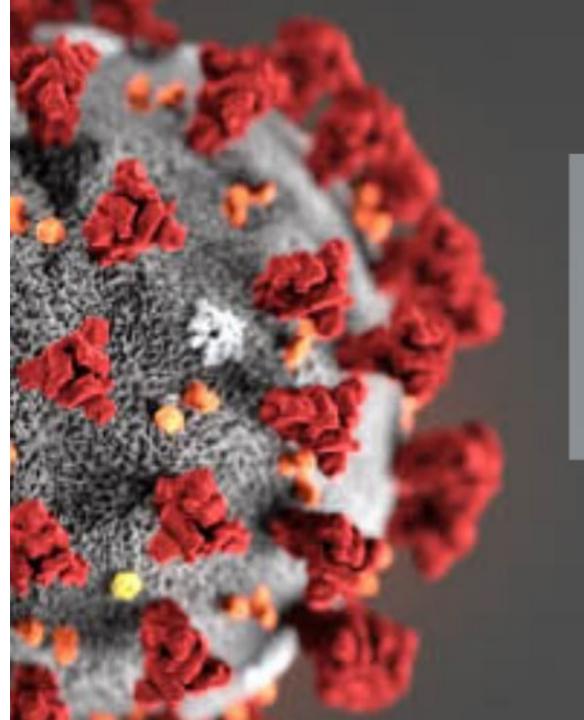


- Once site visit agenda is finalized, reserve conference rooms and share agenda with all staff participating in the visit
- 48 hours prior: send de-identified list of patients for clinical review
- Make a final review of the master checklist
- Ensure access to documents in multiple locations
- Get a good night's rest!



# HRSA Site Visit 2

...the experience!



# COVID-19

**Novel Coronavirus** 

#### 2014 HRSA Site Visit



# Day 1

#### Morning:

Entrance Conference, module reviews

**HRSA Team Lunch** 

**Afternoon**: Module reviews

# Day 2

Morning: Health Center Tour, module reviews

**Consumer Lunch** 

Afternoon: Module reviews

# Day 3

Morning: Module reviews, meetings with staff

**HRSA Team Lunch** 

**Afternoon**: Exit conference

#### Site Visit Results



- At exit conference; received preliminary results with the promise of a comprehensive final site visit report with 60 days
- Majority of requirements were "met"; remaining were identified as "partially met" or "not met"
- Site visit provided an opportunity to receive critical feedback and technical assistance from experts with years of Ryan White Program oversight experience



# HRSA Site Visit 3

Following the visit

#### Corrective Action Plan



Part C H76HA00077 Philadelphia Dept of Public Health December 9- 11, 2015 DCHAP SITE VISIT

CORRECTIVE ACTION PLAN.	ΡΔΚΙ (*			
CRITICAL FINDING	PERSONS RESPONSIBLE, DUE DATE	INTERVENTION/ ACTION	PROGRESS TO DATE	DATE RESOLVI
	ADN	MINISTRATIVE- Administrative Structure and	d Management A1	
A1:1- PDPH's agreements and professional services contract General Provisions do not contain all required federal provisions, and do not adequately address annual monitoring components.	City of Philadelphia Law Department - Who Do We Contact? Due Date: 7/1/2016			
A1:2- There is not an HIV Program subcontract/grantee monitoring policy in place to ensure that subgrantees are meeting the administrative and clinical requirements, particularly verification of credentialing and licensing and	Work with subcontractors and AHS contract staff to incorporate Due Date: 1/1/2016			
ADMINISTRATIVE- Data Reporting A2				
	AHS HIV Program staff Due Date: 10/1/2015	Program staff will convene quarterly to review program data and make decisions for future of program. All meetings and decisions will be well documented in the CQI plan and in the program's annual report.		
	ction Plan Part D Sheet3	<b>(+)</b>	: 4	·

#### Key Take-Aways



- Maintain records like you are always preparing for a site visit
- Document, document, document!
- Develop a policy for every agency operation and procedure

#### Final thought

The site visit is intended to help you...use it as an opportunity to improve your program!