

# **Allowable Uses of Funds of RWHAP Funds: *A Closer Look at the Updated Service Categories***

## **Policy Clarification Notice (PCN) #16-02 Ryan White HIV/AIDS Program Services: Eligible Individuals & Allowable Uses of Funds**

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# Disclosures

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**Presenter(s) has no financial interest to disclose**

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# HIV/AIDS Bureau Vision and Mission

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## Vision

Optimal HIV/AIDS care and treatment for all.

## Mission

Provide leadership and resources to assure access to and retention in high quality, integrated care, and treatment services for vulnerable people living with HIV/AIDS and their families.

# HIV/AIDS Bureau Priorities

- **National HIV/AIDS Strategy (NHAS) 2020/President's Emergency Plan for AIDS Relief (PEPFAR) 3.0** - Maximize HRSA HAB expertise and resources to operationalize NHAS 2020 and PEPFAR 3.0
- **Leadership** - Enhance and lead national and international HIV care and treatment through evidence-informed innovations, policy development, health workforce development, and program implementation
- **Partnerships** - Enhance and develop strategic domestic and international partnerships internally and externally
- **Integration** - Integrate HIV prevention, care, and treatment in an evolving healthcare environment
- **Data Utilization** - Use data from program reporting systems, surveillance, modeling, and other programs, as well as results from evaluation and special projects efforts to target, prioritize, and improve policies, programs, and service delivery
- **Operations** - Strengthen HAB administrative and programmatic processes through Bureau-wide knowledge management, innovation, and collaboration

# Learning Objectives

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**At the conclusion of this activity, the participant will be able to:**

- **Review Policy Clarification Notice (PCN) #16-02 RWHAP Services: Eligible Individuals & Allowable Uses of Funds category definitions**
- **Apply the RWHAP PCN #16-02 service category clarifications in program implementation**
- **Describe where to find the RWHAP PCN #16-02 and supporting materials**

# Obtaining CME/CE Credit

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If you would like to receive continuing education credit for this activity, please visit:

<http://ryanwhite.cds.pesgce.com>

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

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

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

- Ryan White HIV/AIDS Program Services Report/AIDS Drug Assistance Program Data Reports (RSR/ADR)
- National Monitoring Standards
- Funding Opportunity Announcements
- RWHAP Part Manuals
- Program Terms in the Notice of Grant Awards (NoAs)
- Site Visits Modules



# Background

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- **RWHAP legislation – Title XXVI of the Public Health Service Act**
- **45 CFR Part 75—HHS Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards**
  - §75.351 – 353—Subrecipient Monitoring and Management
  - Subpart E—Cost Principles

# Eligible Individuals Served by the RWHAP

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- The RWHAP serves low-income people living with HIV (PLWH) who are uninsured or underinsured
- Family members and affected individuals may be eligible for RWHAP services in limited situations, but these services must always be to support the health outcomes of a person living with HIV

# Allowable Costs Related to PCN #16-02 – Service Categories\*

- **Store gift cards or vouchers**
- **Core medical and support services in PCN 16-02**
  - Must relate to HIV diagnosis, care and support
  - Must adhere to HIV clinical practice standards and consistent with HHS treatment guidelines

\*Note, these costs relate specifically to PCN #16-02, this is not an exhaustive list of unallowable costs, see 45 CFR Part 75, Subpart E—Cost

# Unallowable Costs Related to PCN #16-02 – Service Categories\*

- Cash payments to intended clients of RWHAP-funded services
- General-use prepaid cards (i.e. Visa, MasterCard)
- Gift cards that are cobranded with the logo of a payment network or affiliated with group of merchants
- Other unallowable costs, which include:
  - Clothing
  - Employment and Employment-Readiness Services
  - Funeral and Burial Expenses
  - Property Taxes

\*Note, these costs relate specifically to PCN #16-02, this is not an exhaustive list of unallowable costs, see 45 CFR Part 75, Subpart E—Cost

# **PCN #16-02 Ryan White HIV/AIDS Program Services: Eligible Individuals & Allowable Uses of Funds – Service Category Definitions**

**Core Medical Services**

**Support 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 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

# RWHAP Core Medical Services

<ul style="list-style-type: none"><li>● <b>Outpatient/Ambulatory Health Services</b></li></ul>	<ul style="list-style-type: none"><li>● <b>AIDS Drug Assistance Program Treatments</b></li></ul>
<ul style="list-style-type: none"><li>● <b>AIDS Pharmaceutical Assistance</b></li></ul>	<ul style="list-style-type: none"><li>● <b>Oral Health Care</b></li></ul>
<ul style="list-style-type: none"><li>● <b>Early Intervention Services (EIS)</b></li></ul>	<ul style="list-style-type: none"><li>● <b>Medical Nutrition Therapy</b></li></ul>
<ul style="list-style-type: none"><li>● <b>Home Health Care</b></li></ul>	<ul style="list-style-type: none"><li>● <b>Home and Community-Based Health Services</b></li></ul>
<ul style="list-style-type: none"><li>● <b>Hospice Services</b></li></ul>	<ul style="list-style-type: none"><li>● <b>Mental Health Services</b></li></ul>
<ul style="list-style-type: none"><li>● <b>Health Insurance Premium and Cost Sharing Assistance for Low-Income Individuals</b></li></ul>	<ul style="list-style-type: none"><li>● <b>Medical Case Management, including Treatment Adherence Services</b></li></ul>
<ul style="list-style-type: none"><li>● <b>Substance Abuse Outpatient Care</b></li></ul>	



# Outpatient/Ambulatory Health Services (OAHS)

## Description:

- Diagnostic and therapeutic services provided directly to a client by a licensed healthcare provider in an outpatient medical setting
- Outpatient medical settings include clinics, medical offices, and mobile vans where clients do not stay overnight. Emergency room or urgent care services are not considered outpatient settings

## Allowable services include:

Medical history taking	Physical examination
Diagnostic testing, including laboratory testing	Prescription and management of medication therapy
Behavioral risk assessment, subsequent counseling, and referral	Treatment and management of physical and behavioral health conditions
Preventive care and screening	Pediatric developmental assessment
Treatment adherence	Education and counseling on health and prevention issues
Referral to and provision of specialty care related to HIV diagnosis	

# Early Intervention Services (EIS)

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## Description:

- The RWHAP legislation defines EIS for RWHAP Parts A, B, and C. See § 2651(e) of the Public Health Service Act

## Guidance:

- Overlaps with other service category descriptions
- Combination of services, rather than stand-alone

# Early Intervention Services (EIS): RWHAP Parts A and B

- **RWHAP Parts A and B EIS services must include the following four components:**
  - Targeted HIV testing
  - Referral services
  - Access and linkage to HIV care and treatment services
  - Outreach Services and Health Education/Risk Reduction

# Early Intervention Services (EIS): RWHAP Part C EIS

- **RWHAP Part C EIS services must include the following four components:**
  - Counseling individuals with respect to HIV
  - High risk targeted HIV testing (confirmation and diagnosis of the extent of immune deficiency)
  - Referral and linkage to care of HIV-infected clients to Outpatient/Ambulatory Health Services, Medical Case Management, Substance Abuse Care, and other services as part of a comprehensive care system including a system for tracking and monitoring referrals
  - Other clinical and diagnostic services related to HIV diagnosis

# Medical Case Management, Including Treatment Adherence Services

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## Description:

- Provision of a range of client-centered activities focused on improving health outcomes in support of the HIV care continuum
- May also provide benefits counseling by assisting eligible clients in obtaining access to other public and private programs for which they may be eligible

# RWHAP AIDS Drug Assistance Program (ADAP) Treatments

## Description:

- State-administered program authorized under Part B of the RWHAP to provide FDA-approved medications to low-income clients with HIV disease who have no coverage or limited coverage from private insurance, Medicaid, or Medicare
- Can be used to purchase health insurance for eligible clients and for services that enhance access to, adherence to, and monitoring of antiretroviral therapy. RWHAP ADAP recipients must conduct a cost effectiveness analysis to ensure that purchasing health insurance is cost effective compared to the cost of medications in the aggregate
- Eligible ADAP clients must be living with HIV and meet income and other eligibility criteria as established by the state

# AIDS Pharmaceutical Assistance

- **Divided into two categories, based on RWHAP Part funding:**
  - Local Pharmaceutical Assistance Program (LPAP) is operated by a RWHAP Part A or B recipient or subrecipient
  - Community Pharmaceutical Assistance Program (CPAP) provided by a RWHAP Part C or D recipient

# AIDS Pharmaceutical Assistance - LPAP

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## Description:

- Operated by a RWHAP Part A or B recipient or subrecipient
- A supplemental means of providing medication assistance when an RWHAP ADAP has a restricted formulary, waiting list and/or restricted financial eligibility criteria



# Local Pharmaceutical Assistance Program (LPAP): Criteria for RWHAP Part A and B

- **RWHAP Part A or B recipients using the LPAP service category must establish the following:**
  - Uniform benefits for all enrolled clients throughout the service area
  - A recordkeeping system for distributed medications
  - An LPAP advisory board
  - A drug distribution system
  - A drug formulary approved by the local advisory committee/board
  - A client enrollment and eligibility determination process that includes screening for ADAP and LPAP eligibility with rescreening at minimum of every six months
- **Coordination with the state's RWHAP Part B ADAP**
  - A statement of need should specify restrictions of the state ADAP and the need for the LPAP
- **Implementation in accordance with requirements of the 340B Drug Pricing Program and the Prime Vendor Program**



# AIDS Pharmaceutical Assistance – CPAP

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## Description:

- **Community Pharmaceutical Assistance Program is provided by a RWHAP Part C or D recipient**
- **The provision of long-term medication assistance to eligible clients in the absence of any other resources**
- **The medication assistance must be greater than 90 days**

# Community Pharmaceutical Assistance Program (CPAP): Criteria for RWHAP Part C and D

- **RWHAP Part C or D recipients using this service category must establish the following:**
  - A financial eligibility criteria and determination process for this specific service category
  - A drug formulary consisting of HIV primary care medications not otherwise available to the client
  - Implementation in accordance with the requirements of the 340B Drug Pricing Program and the Prime Vendor Program

# Health Insurance Premium and Cost Sharing Assistance for Low-Income Individuals

## Description:

- Provides financial assistance for eligible clients living with HIV to maintain continuity of health insurance or to receive medical and pharmacy benefits under a health care coverage program
- The service provision consists of either or both of the following:
  - Paying health insurance premiums to provide comprehensive HIV Outpatient/Ambulatory Health Services and pharmacy benefits that provide a full range of HIV medications for eligible clients
  - Paying cost-sharing on behalf of the client

# RWHAP Support Services

<ul style="list-style-type: none"><li>• <b>Non-Medical Case Management Services</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Child Care Services</b></li></ul>
<ul style="list-style-type: none"><li>• <b>Emergency Financial Assistance</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Food Bank/Home Delivered Meals</b></li></ul>
<ul style="list-style-type: none"><li>• <b>Health Education/Risk Reduction</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Housing</b></li></ul>
<ul style="list-style-type: none"><li>• <b>Other Professional Services</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Linguistic Services</b></li></ul>
<ul style="list-style-type: none"><li>• <b>Medical Transportation</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Outreach Services</b></li></ul>
<ul style="list-style-type: none"><li>• <b>Psychosocial Support Services</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Respite Care</b></li></ul>
<ul style="list-style-type: none"><li>• <b>Rehabilitation Services</b></li><li>• <b>Referral for Health Care and Support Services</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Substance Abuse Services (residential)</b></li></ul>



# Non-Medical Case Management

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## Description:

- **Provide guidance and assistance in accessing medical, social, community, legal, financial, and other needed services**
- **Assist eligible clients to obtain access to other public and private programs for which they may be eligible, such as Medicaid, Medicare Part D, and others**

# Emergency Financial Assistance

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## Description:

- Provides limited one-time or short-term payments to assist the RWHAP client with an emergent need for paying for essential utilities, housing, food (including groceries and food vouchers), transportation, and medication
- Can occur as a direct payment to an agency or through a voucher program

# Health Education/Risk Reduction

## Description:

- **Includes sharing information about medical and psychosocial support services and counseling with clients to improve their health status. Topics covered may include:**
  - Education on risk reduction strategies to reduce transmission such as PrEP for clients' partners and treatment as prevention
  - Education on healthcare coverage options (e.g., qualified health plans through the Marketplace, Medicaid coverage, Medicare coverage)
  - Health literacy
  - Treatment adherence education



# Outreach Services

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## Description:

- **Provision of the following 3 activities:**
  - Identification of people who do not know their HIV status and linkage into OAHS
  - Provision of additional information and education on health care coverage options
  - Reengagement of people who know their status into OAHS

# Other Support Services

## Other Professional Services

- **Such services may include and are not limited to:**
  - Legal services
  - Permanency planning
  - Income tax preparation services

## Referral for health care and support services

- **Directs a client to needed core medical or support services**
- **Includes referrals to assist eligible clients to obtain access to other public and private programs**

# Recap

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- **Policy Clarification Notice #16-02 Eligible Individuals & Allowable Uses of Funds**  
<http://hab.hrsa.gov/>
- **Effective with Fiscal Year 2017 funding**
- **Resources**
  - Frequently Asked Questions
  - Contact your Project Officer

# Questions/Discussion

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# THANK YOU

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