HRSA
Health Resources & Services Administration

Subrecipient Monitoring

Division of State HIV/AIDS Program Administrative Reverse Site Visit

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Vision: Healthy Communities, Healthy People

Common Courtesies

- Interactive Session – Share your experiences
- Listen to others without interrupting
- Be present mentally (turn those cell phones to silent)
- Keep an open mind
- Ask questions
- Non-judgmental approach
- Make no assumptions

Learning Objective

Participants will learn about the requirements of programmatic and universal standards of subrecipient monitoring.

Subrecipient Monitoring

AGENDA

- Purpose of Subrecipient Monitoring
- Legislative Background
- National Monitoring Standards
- Monitoring Subrecipients
- Subrecipient Site Visits
- Poll Everywhere

Purpose of Monitoring

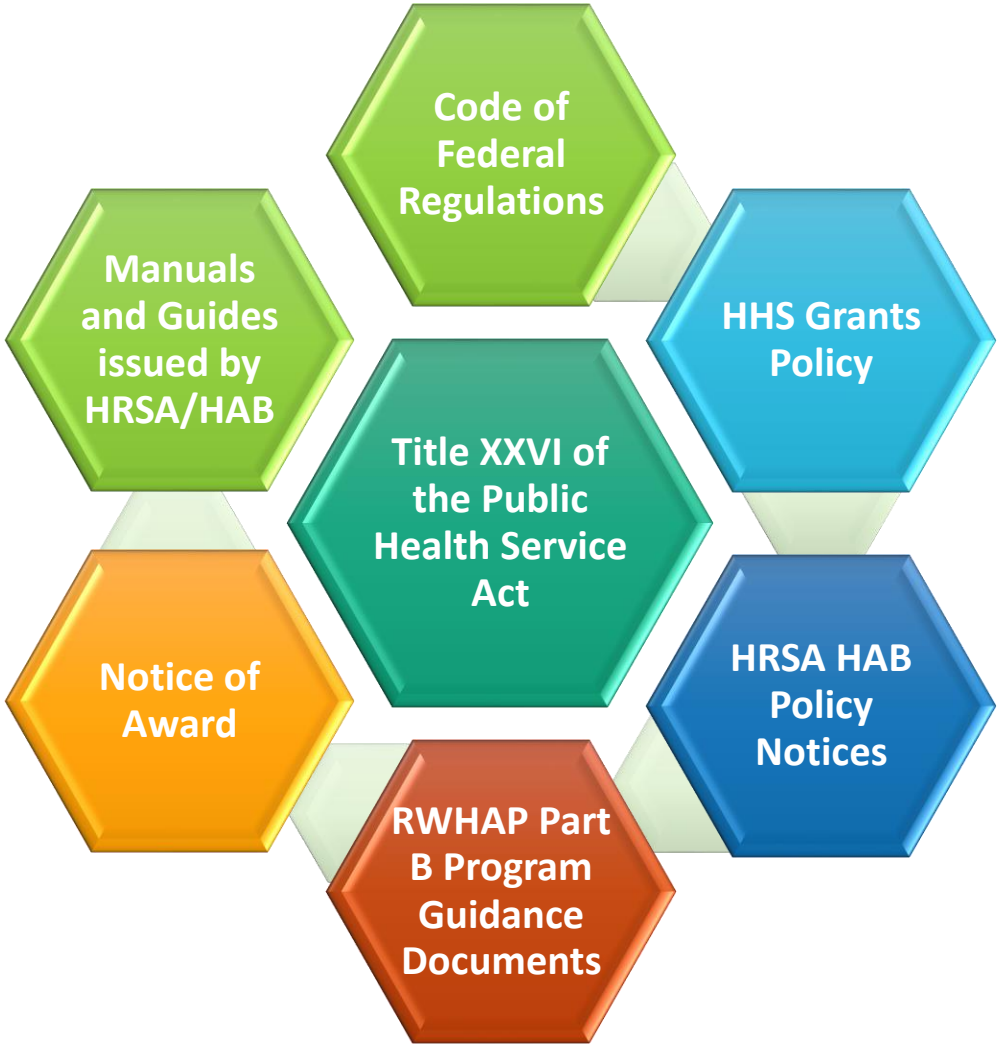
- Required by HRSA to ensure compliance with statutory requirements, regulations and guidance
  - Review and test compliance with applicable laws, regulations, and policies
- Assess efficiency of operations
  - Makes recommendations to enhance efficiency of agency operations, achieve program results, and lower risk
- Technical Assistance (TA) Identification and Provision
- Relationship building
  - Collaboration and Trust

Legislative Background

- 2 CFR Part 200 specifies recipient role in monitoring and reporting program performance
- 2 CFR Part 200.328 – Monitoring and reporting program performance
  - The non-federal entity is responsible for oversight of the operations of the federal award supported activities
  - The non-federal entity must monitor its activities under federal awards to assure compliance with applicable federal requirements and performance expectations are being achieved
  - Monitoring by the non-federal entity must cover each program, function or activity
- 2 CFR Part 200.331 - Requirements for pass-through entities (for subrecipient monitoring)
  - Subrecipient must permit the recipient to have access to records and financial statements
  - Recipients must evaluate risk of noncompliance with federal statutes, regulations and terms and conditions of the award

National Monitoring Standards

- Developed by HRSA HAB. A tool to provide guidance to recipients regarding monitoring expectations of recipients and subrecipients
- Define fiscal and program criteria to be monitored for compliance



Monitoring Subrecipients

- Recipients are required to conduct annual site visits to all subrecipients
  - Includes direct subrecipients, fiduciary agents, consortia lead agencies
  - Consider partnering with other RWHAP Parts
  - **Exception:** Recipients with an approved Annual Site Visit Exemption Request
- Site Visit Team
  - Administrative/Programmatic Reviewer
  - Fiscal Reviewer
  - Clinical Quality Management Reviewer (Suggested)
- Subrecipients must monitor sub-subrecipients for all the same requirements
  - This includes consortia lead agencies

Subrecipient Site Visit

- Develop Site Visit Procedure
  - Pre-Site Visit Activities
  - On-Site Visit Activities
  - Post-Site Visit Activities
- Develop a Site Visit Schedule
  - May use subrecipient risk assessments to guide schedule
- Develop Site Visit Tools
  - Administrative/Program
  - Fiscal
  - Use National Monitoring Standards as a guide
    - Universal
    - Program
    - Fiscal

Pre-Site Visit Activities

- Notify subrecipient in advance
- Review process with subrecipient prior to the visit
  - Monitoring team
  - Subrecipient participants
  - Dates and logistics of visit
  - Logistics of client interviews or feedback groups if appropriate
- Request documents to review before the on-site visit

On-Site Visit Activities

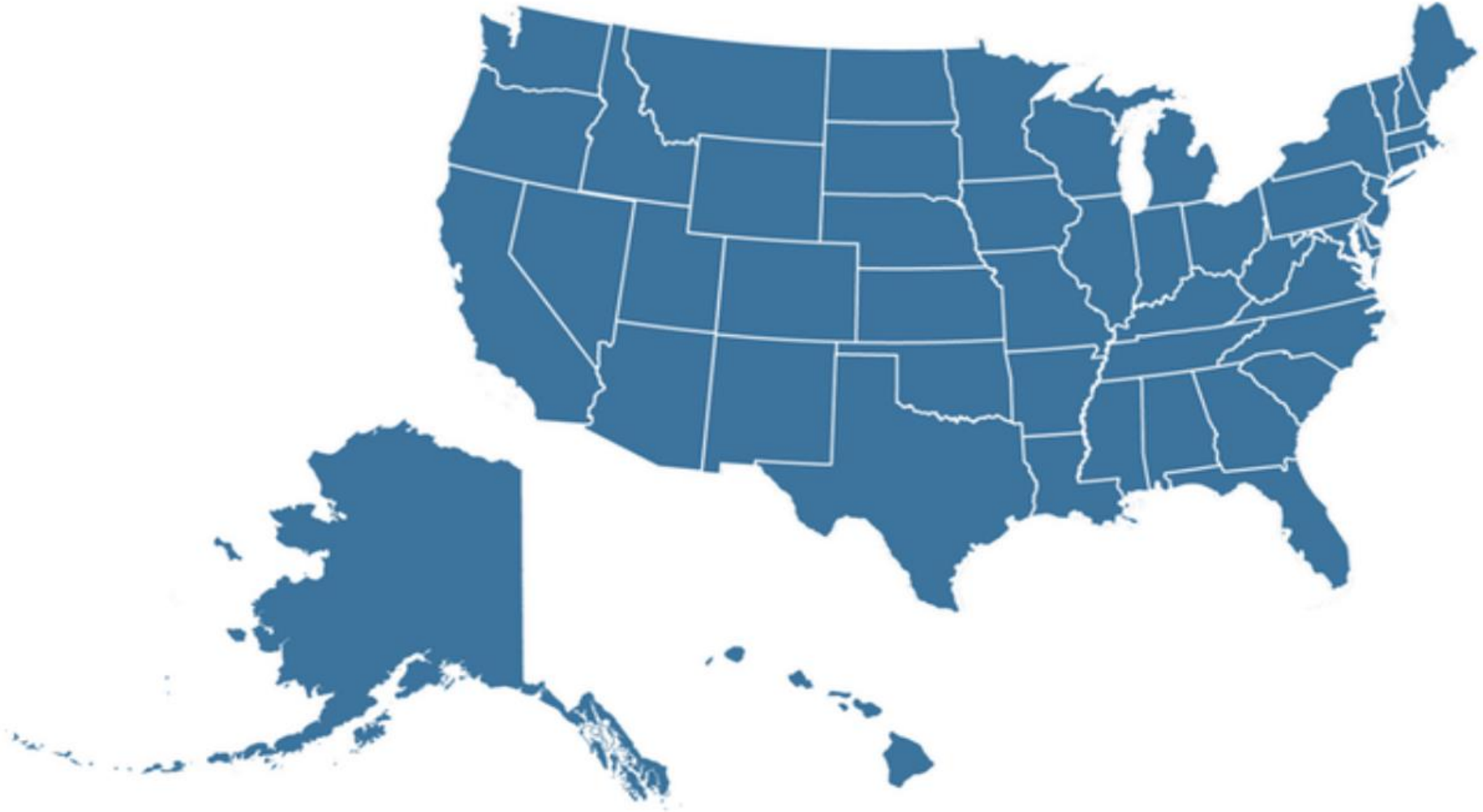
- Entrance meeting with all subrecipient participants
- Monitoring Process
  - Use Administrative/Program and Fiscal review tools
  - Combine staff discussion and document review
  - Review client records or other documentation of service provision
  - Conduct client interviews or feedback groups, if appropriate
- Exit Meeting
  - Inform subrecipient of compliance issues and opportunities for improvement

Post Site Visit Activities

- Site Visit Reports
  - Issue to subrecipients within a reasonable time period
  - Specify compliance issues that require correction
- Corrective Action Plans (CAPs)
  - CAPs should address compliance issues within a defined amount of time
  - Recipients should document resolution of compliance issues
- Schedule follow-up subrecipient visits as needed
- Consider a Site Visit Evaluation completed by subrecipients
  - Provides feedback to improve the monitoring process and values the subrecipient experience

Interactive Session

What branch is your state located in?



How many years have you worked in your position?

Less than 1 year	**A**
1 - 3 years	**B**
3 - 5 years	**C**
Greater than 5 years	**D**

What is the purpose of subrecipient monitoring?

To find out what the subrecipient is doing wrong

Audit and retrieve money from the subrecipient

Empower and support autonomy of subrecipients

Ensure compliance with statutory regulations and guidance

How often should subrecipient monitoring occur?

Annually

Twice a year

Never

Every other year

What areas are required to be reviewed during an annual subrecipient site visit?

Administrative/Program and ADAP

Administrative/Program, Fiscal, Clinical Quality Management performance measures, ADAP

Fiscal only

Administrative/Program and Fiscal

Who is responsible for monitoring the subrecipients of a lead agency/consortia?

The recipient

The lead agency/consortia

The recipient and lead agency

The state contract administration department

When conducting a subrecipient monitoring visit what is the sample size of client charts to review?

Random sample of a % of client charts receiving care at a provider site

75 charts

1,000 charts

Random Sample of a % of total HIV clients in the state

When reviewing the fiscal documents of a subrecipient, what is NOT a part of the review?

Clinical Quality Management Indicators

Allowable Cost

Eligibility

Audit reports, fiscal and internal controls

Part B National Monitoring Standards (NMS) requires annual monitoring site visits to subrecipients. Which is false:

Desk audit can be conducted in place of an annual site visit

Client records are reviewed by random sampling

Site Visit can include staff interviews or facility tours

Site visits are to be conducted annually

If an Office of Inspector General (OIG) visit of a subrecipient resulted in repayment of Federal funds, who is responsible for paying?

- The subrecipient
- The recipient
- Both subrecipient and recipient
- HRSA

A Corrective Action Plan (CAP) is developed when the subrecipient is not meeting certain compliance requirements. Which of the following corrective actions are possible options?

Improved oversight by the funder

Redistribution of funds within the subrecipient budget

Technical Assistance (TA) requests

All of the above

Which is not required as part of an annual subrecipient site visit?

Assessing allowable uses of funds

Assessing eligibility of clients receiving services

Assessing performance of funded staff

Assessing compliance to federal cost principles

Which of the following is true?

Subrecipients must meet all federal requirements, regardless of amount of RWHAP funds received and how many services are provided

Subrecipients awarded less than $10,000 per year are allowed to meet a defined subset of federal requirements

Subrecipients funded for 2 or fewer RWHAP Service Categories are allowed to meet a defined subset of the federal requirements

Subrecipients who are also other governmental entities (for example, state universities or state mental health treatment clinics) are exempt from the annual site visit requirement.

Questions

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