



# National Monitoring Standards Administrative Overview Ryan White Part B

June 7, 2011

Harold J. Phillips  
Chief, Northeastern Central Services Branch

LTJG Brittany Bovenizer  
Project Officer, Northeastern Central Services Branch

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



# Welcome and Session Overview

- Why Do We Need the National Monitoring Standards?
- What Are the National Monitoring Standards?
- Who Will Use the National Monitoring Standards?
- What's Covered in the National Monitoring Standards?



## Welcome (continued)

- What Are the Expectations of Grantees and Sub Grantees/Providers?
- How to Use the National Monitoring Standards?
- Questions and Answers



# Why Do We Need the National Monitoring Standards?

- Clarify the oversight expectations of Ryan White Part A & Part B Programs
- Design a specific set of minimum expectations for monitoring
- Specify the roles of HRSA and Grantees regarding the monitoring of subgrantees
- Address concerns of HRSA, Congress and OIG regarding oversight issues



# Why Do We Need the National Monitoring Standards? (Continued)

## Contract monitoring

- Fiscal Monitoring – a system to assess the appropriate use of funds including the control, disbursement, use and reporting of allowable costs
- Program Monitoring – a system to assess whether allowable services are provided to eligible clients according to service limits
- Quality Management – a system to assess the degree to which a service meets or exceeds established professional standards and user expectations



# Why Do We Need the National Monitoring Standards? Many Relevant Materials

- Legislation
- Code of Federal Regulations
- HHS Grants Policy Manual
- HRSA/HAB Policies
- Parts A and B Guidance
- Title I & Title II Manuals
- Conditions of Award/Notices of Grant Award
- OIG Reports and Recommendations



# Why Do We Need the National Monitoring Standards? Issues of Concern

- Assessment of the role of the project officer in monitoring the Ryan White Care Act Title I and Title II Grantee's programmatic performance (OIG, March 2004)
  - Limited monitoring of grantees' fiscal performance
  - Lack of focus on grantees' monitoring of subgrantees
  - Existence of few corrective actions taken



# Why Do We Need the National Monitoring Standards? Issues of Concern

- Assessment of the Ryan White CARE Act Title I and Title II grantees' monitoring of subgrantees (OIG, March 2004)
  - 15 out of 20 grantees did not have comprehensive documentation to demonstrate that they were monitoring subgrantees systemically. (contract or formal agreement, a program report, a fiscal report for all 5 of their subgrantees) Note: Only 4 Grantees had a site visit report for all 5 subgrantees)
  - HRSA does not always require grantees to report how they monitor subgrantees
  - HRSA does not systemically monitor grantee oversight of subgrantees





# Why Do We Need the National Monitoring Standards? Issues of Concern

- **OIG Fiscal Audits and Studies on Improper Payments for Part A Programs (Study of 15 Part A programs)**
  - Inadequate fiscal monitoring (40% or 6 out of 15)
  - Unallowable costs (47% or 7 of 15)
  - Unsupported costs (60% of 9 of 15)



# Why Do We Need the National Monitoring Standards? OIG Recommendations

- Specify and enforce standards and guidelines for how grantees should monitor grantees
- Standardize a corrective action process and address grantee issues more formally
- Increase the frequency and comprehensiveness of site visits



# Why Do We Need the National Monitoring Standards? OIG Recommendations

- Set standards for grantees monitoring of subgrantees that, at a minimum, require a contract or formal agreement, a program report, and a fiscal report and some consideration for regular site visits
- Require grantees to report how they monitor their subgrantees in accordance with these standards as part of every application
- Increase efforts to monitor grantees' oversight of subgrantees, including using information grantees report to HRSA regarding subgrantee activities



# What Are the National Monitoring Standards?

- National Monitoring Standards Packet for Ryan White Part A and Part B Programs Contain
  - Ryan White Part A
    - Universal Monitoring Standards
    - Fiscal Monitoring Standards\*\*
    - Program Monitoring Standards\*\*
    - Frequently Asked Questions
  - Ryan White Part B
    - Universal Monitoring Standards
    - Fiscal Monitoring Standards\*\*
    - Program Monitoring Standards\*\*
    - Frequently Asked Questions



# Structure of The National Monitoring Standards

- Three Major Sets
  - Universal
  - Fiscal: separate A and B
  - Program: separate A and B
- Each individual monitoring standard
  - Connected to a source which is cited
  - Has a grantee and/or sub grantee responsibility
  - Performance measure/method
  - Clearly stated performance measure and method



## Structure of the FAQ's

- THE FAQ's PRESENT ANSWERS REGARDING
  - National Monitoring Standards Basics
  - Structure of the Standards
  - Implementation of the National Monitoring Standards
  - Each of the Three Sets: Universal, Program and Fiscal



# Basics of The National Monitoring Standards

- Grantees are expected to comply with all of the standards
- They are expected to comply in FY 2011
- The standards do not address how much documentation should be sent in with monthly invoices
- Grantees can develop their own ways to measure compliance
- There is flexibility regarding how to implement the monitoring standards



# Implementation of The National Monitoring Standards

## Grantees must:

- Review the Standards
- Share the standards and supporting materials with program and fiscal staff who have monitoring responsibilities
- Share the standards with providers as appropriate
- Review current monitoring systems, procedures, and tools for potential revision





# Implementation of The National Monitoring Standards

## Grantees must (continued):

- Meet with legal, contracts, procurement, finance and other government entities to familiarize them with the National Monitoring Standards
- Implement grantee and subgrantee responsibilities (make sure alternate approaches meet standards)
- Review RFPs and contract language to assure that they specify services to be provided, data collected and to be reported with the National Monitoring Standards



# Implementation of The National Monitoring Standards

- Grantees must (continued):
  - Begin integrating the National Monitoring Standards into contracting and monitoring efforts – monitoring tools, site visit schedules and scopes as needed
  - Hold meetings with providers/subgrantees to introduce the Standards and clarify compliance issues
  - Make standards easily accessible to providers/subgrantees
  - Fully implement any needed changes in your subgrantee monitoring (policies, procedures, tools, management and reporting)
  - Contact Project Officer if there are additional questions or concerns



# Universal Standards

- Monitoring
- Eligibility Determination/Screening
- Anti-Kickback Statute
- Grantee Accountability
- Access to Care
- Reporting



## Expected Issues of Concern Universal Standards

- Detail of grantee monitoring responsibilities and components of comprehensive monitoring
- Annual comprehensive site visits
- Reassessment of client eligibility every six months
- Documentation of eligibility



# Fiscal Monitoring Standards

- Limitations on Uses of Funding
- Unallowable Costs
- Income From Fees and Services Performed
- Imposition and Assessment of Client Charges
- Financial Management
- Property Standards



# Fiscal Monitoring Standards

- Cost Principles
- Auditing Requirements
- Matching or Cost Sharing Funds
- Maintenance of Effort
- Fiscal Procedures
- Unobligated Balances



# Expected Issues of Concern Fiscal Monitoring Standards

- Indirect Costs
- Medicaid Certification of Providers
- Program Income
- Caps on Charges (Sliding Fee Scale)
- Documentation to Support Costs/Charges



# Program Monitoring Standards

- Allowable Uses
- Core Medical Services
- Support Services
- Quality Management
- Administration
- Other Service Requirements





# Program Monitoring Standards

- Prohibitions and Additional Requirements
- Chief Elected Official Assurances
- Minority AIDS Initiative



# Expected Issues of Concern Program Monitoring Standards

- Service Category Definitions
- Legal Services
- CEO Assurances
- Systems for Documentation



## What Happens Next?

- Summer webinar series (4 Sessions beginning late June-early July)
- First major update will be in October 2011
- Issues or corrections should go through your Project Officer



## Technical Assistance

- Work with your project officer
- Individualized conference calls
- Review of monitoring tools and systems
- Peer TA through the Target Center (late summer)



## Contact Information

Harold J. Phillips  
Chief, Northeastern/Central Services Branch  
301-443-8109  
[Hphillips@hrsa.gov](mailto:Hphillips@hrsa.gov)

Brittany Bovenizer  
Project Officer, Northeastern/Central Services Branch  
301-443-0510  
[bbovenizer@hrsa.gov](mailto:bbovenizer@hrsa.gov)