



August 23, 2023

Dear Ryan White HIV/AIDS Program Parts A and B Recipients:

This program letter provides an update to the deadline to request an annual subrecipient site visit exemption and replaces information provided in prior program letters with the most recent letter '[FY22 RWHAP Part A and B Annual Site Visit Letter](#)' issued on March 30, 2022.

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards, 45 CFR § 75.352, requires recipients to monitor the activities of subrecipients to ensure funding is used for authorized purposes, in compliance with federal statutes, regulations, and the terms and conditions of the subaward; and subaward performance goals are achieved. Recipients must ensure that subrecipient expenditures adhere to legislative requirements regarding the distribution of funds. Recipients must also ensure that subrecipients track, appropriately use, and report program income generated by the subaward in accordance with the Health Resources and Services Administration's (HRSA) HIV/AIDS Bureau's (HAB) [Policy Clarification Notice 15-03 Clarifications Regarding the Ryan White HIV/AIDS Program and Program Income](#). HRSA HAB requires Ryan White HIV/AIDS Program (RWHAP) Parts A and B recipients to conduct annual subrecipient site visits to meet the monitoring requirements. This requirement is incorporated as program guidance in the respective RWHAP [Part A](#) and [Part B](#) Manuals and is included as a term on RWHAP Parts A and B recipient Notices of Award.

In recent years, HRSA HAB and RWHAP Parts A and B recipients demonstrated that remote site visits are often an effective way to meet the goals and objectives of recipient and subrecipient monitoring. Therefore, recipients can explore opportunities to perform these visits virtually or via a hybrid approach (virtual/in-person), as appropriate.

### Submission Process

To submit a request for an exemption from the annual site visit requirement, recipients must notify their project officer (PO) of their intention to request an exemption. The PO will initiate a Request for Information in the Electronic Handbooks (EHBs). The recipient must respond to the EHBs task by the established due date with an exemption request that addresses the following:

- How many subrecipients does the program fund and monitor?
- What are the barriers and challenges to conducting annual site visits to all subrecipients?

- If the program is unable to conduct annual site visits, what is the frequency and/or schedule of visits that the program can conduct?
- How many years are needed to conduct a full cycle of visits to all subrecipients?
- Does the state, eligible metropolitan area, or transitional grant area have a site visit protocol? If so, include with the request in the EHBs.
- What is the program's monitoring plan during the years that subrecipients are not receiving a site visit?
- What is the program's process for issuing and monitoring corrective action plans?

If submitting a multi-year exemption, recipients must submit a site visit timeline and comprehensive monitoring plan that is appropriate for the scope and complexity of the jurisdiction's system of HIV care and aligns with the grant budget period. The corresponding grant budget periods are March 1<sup>st</sup> through February 28/29<sup>th</sup> for RWHAP Part A and April 1<sup>st</sup> through March 31<sup>st</sup> for RWHAP Part B.

See the appendix at the end of the letter for additional information on the information to include with your exemption request.

### Submission Deadline

As of fiscal year (FY) 2024, recipients must submit annual subrecipient site visit exemption requests at any time **up to three months into the budget period**. For FY 2023, recipients should submit annual subrecipient site visit exemption requests **as soon as possible, but no later than six months into the budget period. Exemption requests submitted after these dates will not be considered.** Recipients who do not submit an exemption request, or submit a late exemption request, will be required to meet the annual subrecipient site visit monitoring requirement for that budget period.

### Review Process

Upon receipt of the exemption request, the PO will initiate an internal review process within their respective division. The recipient will be notified of the outcome of the review within 30 days. The PO may request additional information from the recipient if needed to make a final determination.

### *Request Approval*

If the exemption request is approved, the duration of the exemption and other requirements will depend on the approved plan and will be detailed in an approval notification letter. Recipients will also receive notification of approval on their final Notice of Award (NoA) or revised NoA if a final has already been issued.

The exemption will remain in effect for the duration of the approved plan. For example, if the approved plan includes a three-year timeline for conducting site visits to all subrecipients and implementing an alternate comprehensive monitoring approach, then the exemption

would be in effect for three years. The PO will monitor adherence to the approved site visit timeline and comprehensive monitoring plan through monthly monitoring calls and comprehensive site visits. Recipients also must provide updates on their subrecipient monitoring activities as part of their annual progress report submission.

Throughout the duration of the approved plan, exemption approvals are dependent upon satisfactory reporting on plan implementation during monthly monitoring calls and annual progress reports; and confirmed compliance with the approved plan during a HRSA HAB site visit, should one occur during the duration of the approved plan. Recipients must obtain prior approval on any changes to their approved plan. When an approved exemption expires or is terminated due to non-compliance, recipients must submit a new exemption request for the subsequent year(s).

*Request Disapproval*

If the exemption request is denied, the PO will send a disapproval letter to the recipient through the EHBs and detail the reasons for the denial. If the initial exemption request is denied, the recipient may modify the request by addressing the reasons provided by HRSA HAB. Plans must be re-submitted within 15 business days for reconsideration.

If you have any questions regarding exemptions to the annual subrecipient site visit monitoring requirement, please contact your PO. Technical assistance is available for recipients who wish to improve or modify their comprehensive monitoring systems.

Sincerely,

/Chrissy Abrahms-Woodland/

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HIV/AIDS Bureau  
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## **Appendix**

### **Information to Consider for a Subrecipient Annual Site Visit Exemption Request**

#### **How many subrecipients does the program fund and monitor?**

- In your response, include a clear description of the number subrecipients.

#### **What are the barriers and challenges to conducting annual site visits?**

- Examples of barriers/challenges include:
  - Subrecipient dispersion – requires overnight stays to conduct visits, terrain is complex, or highly remote area.
  - Large subrecipient quantity and low recipient staff to high subrecipient ratio.
  - Challenges or limitations regarding hiring, retention, or securing staff.

#### **If the program is unable to conduct annual site visits, what is the frequency and/or schedule of visits that the program can conduct?**

- Include a description of a specific plan, schedule, or descriptive overview for how the recipient, consortia, or administrative agency will visit subrecipients.
- Describe how subrecipients are prioritized across the multi-year site visit process (e.g., funding level, previous site visit or audit findings, geography). Ensure that the description includes all subrecipients.
- Address subrecipient risk in proposed monitoring plan or site visit selection (e.g., ensuring adjustments to the plan are made if a problem arises, or vendor turnover occurs).
- If applicable, include a plan for how the recipient will track and monitor consortia/administrative agency plans to visit subrecipients.

#### **How many years are needed to conduct a full cycle of visits to all subrecipients?**

- Is the timeframe for completing visits commensurate to the number of subrecipients, and challenges and barriers identified?
- Is the overall monitoring plan commensurate to the number of subrecipients, and challenges and barriers identified?

#### **Does the state, eligible metropolitan area, or transitional grant area have a site visit protocol? If so, please attach in the EHBs.**

- Submission of protocol is useful for monitoring and assessing comprehensiveness of overall approach. Exemption request may be denied if a site visit protocol is not submitted.
- Does the protocol include monitoring of programmatic, fiscal, and clinical quality management (CQM) activities?

#### **What is the program's monitoring plan during the years that subrecipients are not receiving a site visit?**

- Describe a comprehensive plan that ensures monitoring of subrecipients, of which site

visits is one component. A comprehensive plan implemented by the recipient and/or administrative agency, should be multi-faceted, and may include:

- Review/approval of mandatory fiscal documents, progress reports, or other submissions pertaining to the type, cost, and quality of services provided; and/or health outcomes of clients receiving services.
- Monitoring calls.
- Client interviews.
- Remote desk audit/paper review.
- Documenting and following-up on identified compliance concerns.

**What is the program's process for issuing and monitoring corrective action plans?**

- The process should adhere with expectations outlined in RWHAP Part A or Part B manual, as applicable.